

# OAK RIDGE SITE SPECIFIC ADVISORY BOARD



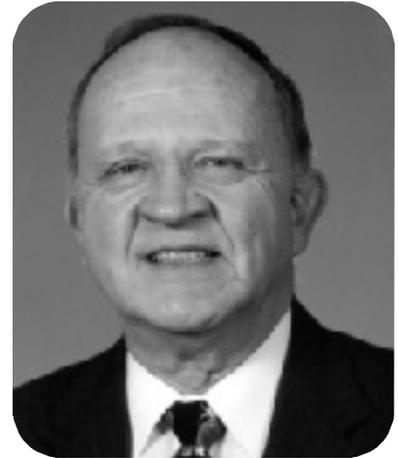
1999  
ANNUAL REPORT

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## WELCOME TO THE ORSSAB 1999 ANNUAL REPORT

This has been a year of accomplishment for the Oak Ridge Site Specific Advisory Board (ORSSAB), as we have matured in our knowledge and in our processes of operation. At the start of the year we paused in our ongoing activities and held a facilitated, full-day planning meeting where we reviewed the previous year's activities; discussed our role, philosophy, and function; and laid the groundwork for a productive year. This included a restructuring of our project teams, which do the bulk of the Board's work in preparation of recommendations for review and approval by the Board. Details of this organizational structure are included later in this report. As Chairman, I was very fortunate to have the support of a strong and effective executive committee, made up of the leaders of the project teams, along with the other two elected ORSSAB officers. In addition, all members of the Board made substantial contributions.



The increased effectiveness of the structure, the improved planning, the dedication of all members, and our increased experience in working together all contributed to a productive year.

Our accomplishments were numerous. Examples that come quickly to mind include:

- A greatly expanded public outreach effort to educate the public about ORSSAB and the importance of the DOE Environmental Management Program.
- The addition of Anne-Marie Wiest, a high school student participant, who added a vital new perspective. (We must remember that her generation will live with our decisions.)
- Increased influence on the budget and prioritization public participation process for the DOE-Oak Ridge Operations Environmental Management Program and better interactions with DOE-Headquarters on budget concerns.
- Improved interaction and cooperation with SSABs at other DOE sites to address problems of common concern, most notably in the areas of low-level waste disposal and transportation. We all learned to understand other sites' distinctive problems.
- Sponsorship of a broad-based community effort to understand and help DOE and other sites recognize the long-term stewardship needs for DOE reservations after remediation is complete. This led to plans for a 3-day national SSAB meeting on stewardship, which was held in Oak Ridge on October 25-27, 1999, and to a report on stewardship.
- Submittal of 15 recommendations and comments to DOE-Oak Ridge Operations Environmental Management during the year.

The diversity of membership improved with the addition of six members during the year; however, we recognize that even greater diversity would be beneficial to our responsibility of representing all citizens. Finally, six of our hardworking members whose terms of service expired chose not to be reappointed to the Board. We will miss them.

*William M. Pardue*

William M. Pardue, Chair

# GENERAL INFORMATION

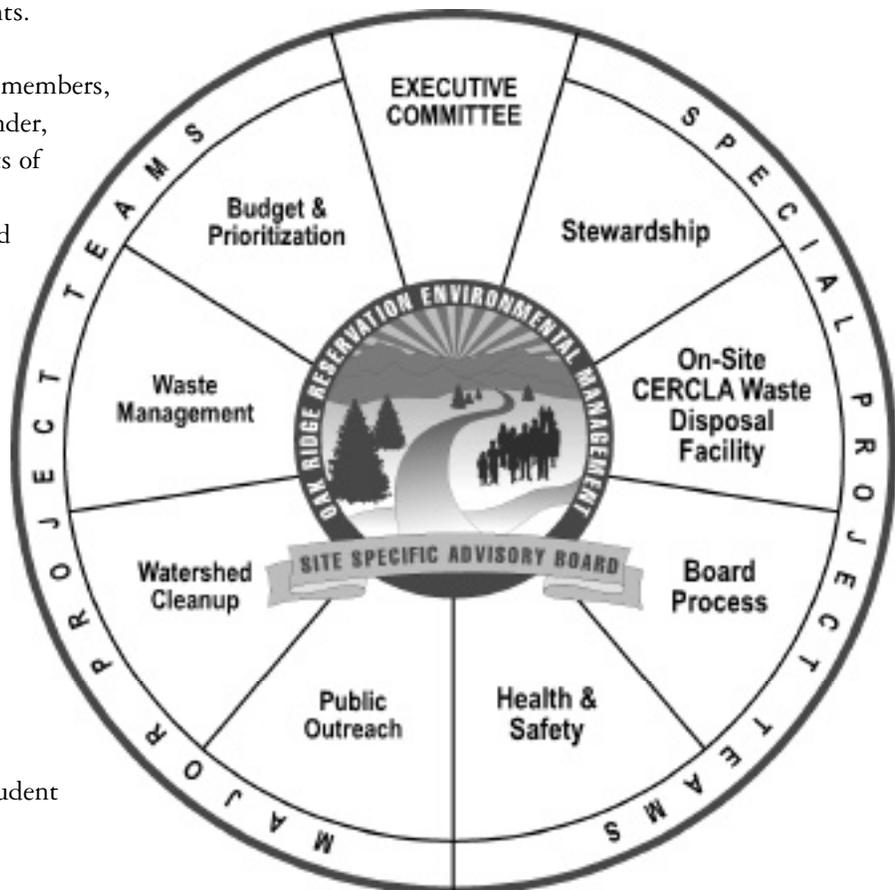
The Oak Ridge Site Specific Advisory Board (ORSSAB) is a federally appointed citizens' panel that provides advice and recommendations to the U.S. Department of Energy (DOE) on its Oak Ridge Operations (ORO) Environmental Management (EM) Program. The group was formed in 1995 and is chartered under the Federal Advisory Committee Act.

The Board is dedicated to providing informed recommendations and advice to the DOE EM Program regarding environmental restoration and waste management, as well as land use and economic development of contaminated areas. Recommendations regarding environmental justice, health and safety issues, and other subjects may be developed at the Board's discretion. The Board is committed to reflecting the concerns of the communities impacted by environmental management of the Oak Ridge Reservation (ORR) and to serving as a communications link between the public and the relevant government agencies, including local governments.

The Board is composed of up to 20 members, chosen to reflect the diversity of gender, race, occupation, views, and interests of persons living near the ORR. Members are appointed by DOE and serve on a voluntary basis, without compensation. The Board currently consists of 14 voting members from four counties: Anderson, Knox, Loudon, and Roane. Non-voting members include representatives from the DOE-ORO Office, the U.S. Environmental Protection Agency (EPA) Region 4, and the Tennessee Department of Environment and Conservation (TDEC). These members advise the Board on their respective agency's policies and views. A non-voting student

participant also serves on the Board to represent the viewpoints and concerns of area youth.

ORSSAB provides a number of avenues for the public to learn and express views about DOE-ORO EM work. All Board and project team meetings are open to the public and are announced in newspaper advertisements and in the Federal Register, at the Information Resource Center in Oak Ridge, and through the Board's 24-hour information line: 865-576-4750. Board meetings are video recorded and broadcast on local cable television; copies of the tapes are available for public review. The Board maintains a Web site at <http://www.oakridge.doe.gov/em/ssab/>, where other information can be found. Information is also available by calling the ORSSAB support office at 865-241-3665 or 1-800-382-4582, Monday–Friday, 8:00 a.m. to 5:00 p.m. Eastern Time.



## BOARD MEETINGS

The Board meets monthly to hear presentations by persons working on relevant environmental management topics, listen to and discuss input from concerned citizens, consider recommendations to DOE developed by the various ORSSAB project teams, and conduct other business. The Board conducts business under Roberts Rules of Order and strives for consensus in reaching decisions. See Appendix A for a listing of Fiscal Year (FY) 1999 Board meetings.

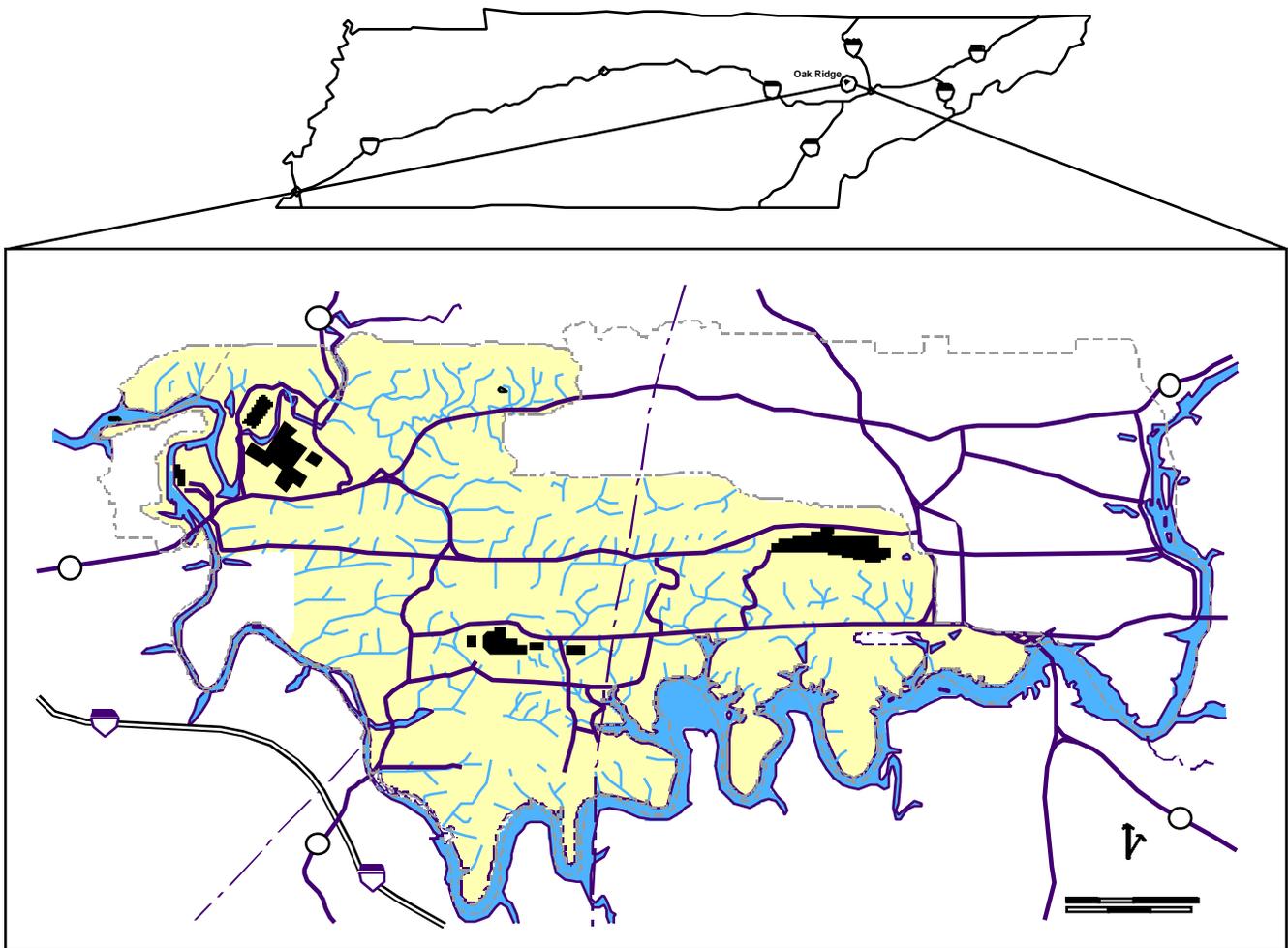
Waste Management, and Watershed Cleanup. Four special project teams were formed to address special issues: Board Process, Health and Safety, Stewardship, and On-Site CERCLA Waste Disposal Facility. Standing and special project teams usually meet monthly, and all meetings are open to the public.

## FY 1999 BOARD OFFICERS

Chair: Bill Pardue; Vice Chair: Bob Peelle; Secretary: Rikki Traylor.

## PROJECT TEAMS

At the start of FY 1999 the Board established standing project teams to review issues concerning four topic areas: Budget and Prioritization, Public Outreach,



Map of the Oak Ridge Reservation showing East Tennessee Technology Park (ETTP (formerly the K-25 Site)), Oak Ridge National Laboratory (ORNL), and the Oak Ridge Y-12 Plant (Y-12).

# FY 1999 RECOMMENDATIONS & COMMENTS

In FY 1999 the Board studied a variety of issues related to DOE EM activities. Review of an issue usually begins in the project teams, which prepare draft recommendations and comments for Board review and approval. The review process often includes detailed briefings in an open forum where Board members may ask questions and discuss their views. All meetings are open to public participation and comment, which is an integral part of the ORSSAB study and recommendation process. Each monthly Board meeting includes time for public input and response, and citizens

attending the meetings are invited to ask questions and express views following technical briefings.

Following is a list of the recommendations and comments submitted to DOE-ORO and other organizations during FY 1999. See Appendix B for text of recommendations and comments. A brief history of each recommendation or set of comments and DOE's response (where applicable) are also included. Complete text of all recommendations is available at the Information Resource Center and on the Board's Web page.

NUMBER	RECOMMENDATION OR COMMENT	DATE ISSUED
C10/8/98.1	Comments on Draft DOE Order 435.1	10/8/98
C10/16/98.2	Comments on Shipping Mixed Low-Level Wastes from the Nevada Test Site to the Oak Ridge Toxic Substances Control Act Incinerator	10/16/98
C10/16/98.3	Comments on the DOE-Oak Ridge Operations Budget	10/16/98
R11/5/98.1	Recommendation for Including Public Involvement in Proposals for the Environmental Management Waste Management Facility at the Oak Ridge Reservation	11/5/98
C11/5/98.4	Comments on the <i>Proposed Plan for the Melton Valley Watershed, Oak Ridge, Tennessee</i> (DOE/OR/01-1724&D1)	11/5/98
C12/4/98.5	Comments on the <i>Preapproval Draft Environmental Assessment: Intermodal Transportation of Low-Level Radioactive Waste to the Nevada Test Site</i>	12/4/98
C03/12/99.6	Comments on the <b>Proposed Plan for the Disposal of Oak Ridge CERCLA Wastes</b> (DOE/OR/01-1761&D3)	3/12/99
C03/12/99.7	Comments on the <i>Draft Environmental Assessment for the DOE-ORO Receipt and Storage of Uranium Materials from the Fernald Environmental Management Project Site</i> (DOE/ORO-2078)	3/12/99
C03/12/99.8	Comments on the Nevada Test Site Environmental Impact Statement Record of Decision Amendment	3/12/99
C03/12/99.9	Comments Relative to Alternatives Within the Waste Management Programmatic Environmental Impact Statement Settlement	3/12/99
C05/17/99.10	Comments on the <i>Site-Wide Environmental Impact Statement for Modernization of the Y-12 Plant</i>	5/17/99
C06/2/99.11	Comments on <i>Draft Accelerating Cleanup: Paths to Closure, Oak Ridge Operations Office, May 1999</i>	6/2/99
R06/2/99.2	Recommendation on the <i>Oak Ridge Reservation Annual Site Environmental Report for 1997</i>	6/2/99
C07/7/99.12	Comments on the <i>Record of Decision, D1, for Disposal of Oak Ridge Reservation CERCLA Waste, Oak Ridge, Tennessee, May 1999</i> (DOE/OR/01-1791&D1)	7/7/99
R07/7/99.3	Recommendation on Stakeholder Statements from the SSAB Transportation Workshop, May 1999	7/7/99

# BOARD CORRESPONDENCE

**LETTER TO THE HONORABLE WILLIAM RICHARDSON,  
SECRETARY OF ENERGY, DATED 10/20/98:**

**“INVITATION TO BOARD MEETING”**

Soon after Mr. Richardson was appointed Secretary of Energy, the Board extended an invitation to him to attend the Board’s December 1998 meeting or to schedule a shorter meeting with the Executive Committee. The letter also expressed the Board’s eagerness to begin a dialogue with the Secretary concerning the many issues facing the ORR.

**LETTER TO THE IDAHO NATIONAL ENGINEERING  
AND ENVIRONMENTAL LABORATORY CITIZENS  
ADVISORY BOARD (CAB), DATED 11/6/98:**

**“BARRIERS TO DOE-EM PROGRESS”**

The Board was among numerous other SSABs and CABs asked to rank 17 suggestions for overcoming barriers to EM progress. These barriers included (1) Economic Considerations; (2) Environmental/Safety Considerations; (3) Equity, Interstate, Tribal, and Environmental Justice Considerations; (4) System-Wide Considerations; and (5) Transportation Considerations. The Board compiled the results of individual members’ rankings and forwarded these results, along with comments, in this letter.

**LETTER TO THE COMMUNITY REUSE ORGANIZATION  
OF EAST TENNESSEE (CROET), DATED 12/4/99:**

**“REQUEST FOR AN EQAB MEMBER TO BE  
APPOINTED TO CROET”**

In this letter ORSSAB urged CROET to appoint an Environmental Quality Advisory Board (EQAB) member to the CROET board as a way to foster cooperation and mutual goal-seeking between CROET and the Oak Ridge community. The board applauded CROET for bringing compatible industry to the East Tennessee Technology Park (ETTP), and strongly supported the continued existence of a seat for an environmental organization, such as EQAB, on the CROET board.

**LETTER TO THE JOHN S. APPLIGATE, CHAIR OF THE  
DOE EM STEWARDSHIP COMMITTEE, DATED 3/15/99:**

**“STEWARDSHIP ISSUES”**

Following Mr. Applegate’s visit to Oak Ridge to discuss stewardship, the Board provided a list of what it

considered to be the most important stewardship issues for DOE to address:

- Establishment of one central stewardship organization
- Involvement of DOE senior management in stewardship planning
- Development of generic DOE guidance to assist sites in their long-term stewardship planning
- Involvement of stakeholders in the development of long-term stewardship planning and guidance
- Use of the Programmatic Environmental Impact Statement (PEIS) settlement to expedite DOE planning and guidance for long-term stewardship
- Establishment of a funding mechanism for long-term stewardship

**LETTER TO THE EPA REGION 4 DOE REMEDIAL  
SECTION, DATED 5/17/99:**

**“SUPPORT TO ORSSAB”**

In response to an earlier EPA letter, this document expressed the Board’s desire to be kept abreast of relevant information regarding development of EPA’s plan to provide support to the SSAB. The Board also requested information regarding what type of support EPA plans to provide and what types of EPA support are provided to other SSABs nationwide.

The Board also expressed interest in receiving an early version of the draft plan for the Scarboro community environmental sampling program.

**LETTER TO ROD NELSON, DOE-ORO, DATED 8/5/99:**

**“UTILIZATION STATISTICS”**

Reduced budgets, coupled with the introduction of management and integration contracting for ORR EM projects, brought reductions in EM staff this year, and some local stakeholders expressed concerns regarding hiring, utilization, promotion, and dismissal practices among EM contractors. In response to these concerns, the Board requested statistics on the manpower utilization of all EM contractors that fall under the protection of the Civil Rights Act of 1964 or that are covered under Office of Federal Contract Compliance Program regulations.

## OTHER FY 1999 BOARD ACTIVITIES

### STEWARDSHIP WORKING GROUP

Since its first meeting on February 18, 1999 the Oak Ridge Stewardship Working Group (SWG) has made steady progress toward its overall goals of identifying long-term stewardship issues and developing a process to ensure “protection of human health and the environment from hazards posed from residual radioactive and chemically hazardous materials”—not just now, but for centuries to come.

Sponsored by ORSSAB, this broad-based, independent citizens’ group has gathered information and interviewed potential stewards in a concerted effort to answer some of the basic questions regarding long-term stewardship:

- What needs to be done?
- Who does what?
- How will information be tracked?
- How will it (long-term stewardship) be paid for?

As a result of ORSSAB stewardship activities, the ORO EM Program is (1) preparing a stewardship plan for the contaminated areas on the ORR; (2) including a stewardship chapter in its *Paths to Closure* budget document; (3) factoring estimated costs for stewardship into planning for life cycle baselines; (4) including a stewardship section in its Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documents; and (5) appointing a DOE point of contact for stewardship.

A National SSAB Workshop on Stewardship, organized by the ORSSAB Stewardship Team, was held October 25-27, 1999, and brought together members of SSABs from across the nation to address stewardship issues that affect their individual sites as well as the



entire DOE complex. A key goal of the meeting was to give representatives from DOE, EPA, and the State of Tennessee the opportunity to hear stakeholder views on stewardship and provide their own insights on the subject. See the “Project Teams” sections for more information about the ORSSAB Stewardship Team.



*Members of the Stewardship Working Group. Seated, left to right: Elizabeth Peelle, Julie Pfeffer, Lorene Sigal, Amy Fitzgerald, Claudia Lever. Standing, left to right: Tyler Johnson, Vic Tenney, Josh Johnson, John Griess, Dan Axelrod, Bert Schappel, Roger Macklin, Bob Peelle, Al Brooks, Ralph Skinner, Dick Ketelle, Steve Kopp, Doug Sarno. Not shown: Martha Berry, Bill Fulkerson, Susan Gawarecki, Marianne Heiskell, Doug McCoy, Dave Mosby, Norman Mulvenon, Bill Pardue, Ken Redus, Dan Robbins, Ellen Smith, Sam Suffern, Charles Washington, Herman Weeren, Michael Westfall, Randy Young.*

The efforts put forth by SWG are expected to come to fruition in December with the publication of the *Oak Ridge Reservation Stakeholder Report on Stewardship, Volume II*. The new report will address issues regarding long-term stewardship in a meaningful and practical way. Even so, group members agree that the new document, which follows the already published reports—the *Final Report of the Oak Ridge Reservation End Use Working Group* and *The Oak Ridge Reservation Stakeholder Report on Stewardship*—is not an end in itself, but another step in a process that will lay a strong foundation upon which to build a lasting and effective long-term stewardship program.

SWG normally meets the first Tuesday of each month at 6 p.m. at the Information Resource Center. For more information about SWG meetings and activities, call the ORSSAB offices at (865) 241-4690.

# PARTICIPATION IN MEETINGS & CONFERENCES

ORSSAB members took part in several meetings and conferences during the year to achieve a variety of goals: (1) gain understanding of relevant technical issues, (2) participate in large group discussion on environmental restoration and waste management policy, (3) discuss subjects of mutual interest with other DOE sites, and (4) develop personal contacts with SSAB counterparts at other sites.

## NATURAL ATTENUATION OF CHLORINATED SOLVENTS IN GROUNDWATER CONFERENCE, NASHVILLE, TENNESSEE, NOVEMBER 1998

Members participating: Lorene Sigal. The purpose of this meeting was to explore (1) the latest developments in natural degradation processes; (2) the physical, chemical, and biological mechanisms for degrading chlorinated solvents in groundwater; and (3) the tools for the documentation and evaluation of natural attenuation projects, based on case studies.

## 14TH ANNUAL OAK RIDGE ENVIRONMENTAL CONFERENCE, OAK RIDGE, TENNESSEE, DECEMBER 1998

Members participating: Steve Kopp, Bill Pardue, Bob Peelle, Lorene Sigal, Rikki Traylor, Charles Washington. The theme of the conference, "EM Integration: Synergies at the National, Regional, and Local Levels," highlighted important changes impacting the DOE EM Program. The agenda included discussion of the DOE-Headquarters (DOE-HQ) EM Integration Initiative, future directions for DOE-ORO, and the Oak Ridge management and integration contract. ORSSAB Chair Bill Pardue gave a presentation and participated in a panel discussion on reindustrialization of ETTP. Conference proceedings included a technical poster session and approximately 50 exhibits.

## SEMIANNUAL SSAB NATIONAL CHAIRS MEETING, AUGUSTA, GEORGIA, FEBRUARY 1999

Members participating: Randy Gordon, Bill Pardue, Lorene Sigal, Charles Washington. The agenda included a "round robin" session where SSAB chairs discussed issues at their sites. Steve Schneider, DOE-HQ, gave a presentation on the Office of Waste Management, and Al Young, Director of the Center for Risk Excellence at Argonne National Laboratory, discussed the center's charter. ORSSAB members Bill Pardue and Lorene Sigal

gave a presentation on stewardship, as it relates to the DOE system, and preliminary plans were laid for a stewardship conference in Oak Ridge in Fall 1999.

## WASTE MANAGEMENT '99, TUCSON, ARIZONA, FEBRUARY 1999

Members participating: Randy Gordon, Lorene Sigal, Charles Washington. The purpose of this trip was to gather the latest information on various topics, such as stakeholder involvement, transportation, the Waste Isolation Pilot Plant, and the Yucca Mountain Project. A secondary purpose was to discuss these topics with representatives from other DOE sites in order to understand their perspectives and to share ORSSAB's experiences at the ORR. ORSSAB member Lorene Sigal gave a presentation at the conference on *The Oak Ridge Reservation Stakeholder Report on Stewardship*.

## ENERGY COMMUNITIES ALLIANCE CONFERENCE, WASHINGTON, D.C., MARCH 1999

Members participating: Rikki Traylor. The reasons for attending this meeting were (1) to have a strong and positive ORR/Tennessee influence at conference; (2) to observe the Energy Communities Alliance board meeting process (parliamentary procedure, consensus, etc.); (3) to observe the use of facilitators; (4) to learn what the leaders felt were the most important issues facing the organization; and (5) to gather information for the public about the work being done and decisions being made at this conference.

## MEETING WITH LEGISLATORS AND TECHNOLOGY CORRIDOR CAUCUS, NASHVILLE, TENNESSEE, MARCH 1999

Members participating: Steve Kopp, Bill Pardue. In late winter, the Waste Management and Public Outreach teams worked together to set up a meeting with state legislators in an effort to inform them about ORSSAB activities. Bill Pardue and Steve Kopp (who are members of both the Waste Management and Public Outreach teams) met with state legislators in Nashville in March. Representative Gene Caldwell joined them in meetings with Senator Ron Ramsey, Chair of the Senate Committee on Environment, Conservation, and Tourism, and Representative Don Ridgeway, Chair of the House of Representatives Committee on Conservation and Environment.

**NATIONAL SSAB WORKSHOP ON WASTE  
TRANSPORTATION, CINCINNATI, OHIO, MAY 1999**

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Members participating: Randy Gordon, Bill Pardue, Rikki Traylor. Hosted by the Fernald CAB, this 3-day workshop was designed to (1) improve stakeholder understanding of transportation-related issues and decision-making processes; (2) foster dialogue among SSABs about national transportation issues, and create opportunities for continuing that dialogue; and (3) identify joint issues and concerns, and begin to draft joint recommendations for the resolution of those concerns. Eight “stakeholder statements” were generated as a result of the workshop, and in July, ORSSAB voted to endorse those statements (see Recommendation R07/7/99.3).

**INTERNATIONAL CONFERENCE ON INCINERATION  
AND THERMAL TREATMENT TECHNOLOGIES (IT3),  
ORLANDO, FLORIDA, MAY 1999**

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Members participating: Randy Gordon, Charles Washington. This conference is held annually to expand understanding of the various types and designs of continuous emissions monitoring devices, new waste treatment technologies, and incinerators used for thermal treatment of wastes. The topics have several tie-ins with The Toxic Substances Control Act Incinerator (TASCI).

**TENNESSEE TECHNOLOGY CONFERENCE, KNOXVILLE,  
TENNESSEE, JUNE 1999**

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Members participating: Joe Alexander, Steve Kopp, Bill Pardue, Rikki Traylor. The 5th Annual Economic Summit and the 26th Annual Tennessee’s Technology Conference (WATTec) were combined this year into Tennessee’s Technology Summit 1999. The theme, “Showcasing Our Technology for Economic Development,” was structured around the diverse resources of people, places, and partnerships of the Tennessee Technology Corridor. The 2-day event featured several technology-oriented sessions and exhibits.

**TRANSPORTATION EXTERNAL COORDINATION  
WORKING GROUP (TEC/WG) SUMMER MEETING,  
PHILADELPHIA, PENNSYLVANIA, JULY 1999**

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Members participating: Randy Gordon. Since 1992, TEC/WG has been working to improve coordination

between DOE and external groups interested in DOE transportation activities. Meetings focus on discussion of upcoming DOE shipping activities, transportation and emergency preparedness-related issues, and proposed DOE approaches to these activities and issues. Topics for the summer agenda included DOE program updates, a panel discussion on private spent fuel storage projects, topic group presentations, and a panel discussion on recent DOE shipments to the Waste Isolation Pilot Plant.

**LONG-TERM STEWARDSHIP WORKSHOP,  
GRAND JUNCTION, COLORADO, AUGUST 1999**

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Members participating: Lorene Sigal. Stewardship includes activities necessary to protect human health and the environment from residual materials (nuclear and chemical) following cleanup. The workshop included presentations and panel discussions on long-term stewardship program issues, post-closure planning, institutional controls, and cover (waste capping) performance.

**ENERGY COMMUNITIES ALLIANCE CONFERENCE,  
RICHLAND, WASHINGTON, SEPTEMBER 1999**

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Members participating: Randy Gordon. “Changing Environments...Focus on the Future” presented opportunities for meeting attendees to study topics such as innovative approaches to soil remediation, developing cleanup levels, states’ roles in advocating full cleanup funding, emergency response, and technology deployment. A tour of the Hanford site and a status review of the new Office of Field Integration were also included in the agenda.

**SEMIANNUAL SSAB NATIONAL CHAIRS MEETING,  
RICHLAND, WASHINGTON, SEPTEMBER 1999**

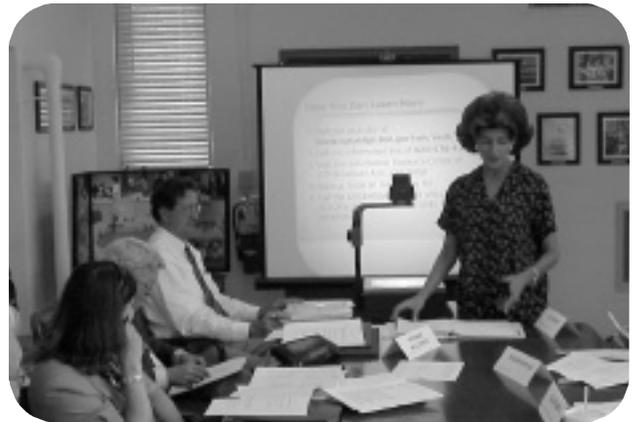
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Members participating: Steve Kopp, Bill Pardue, Lorene Sigal. Hosted by the Hanford Advisory Board, the meeting provided an opportunity for a “round robin” discussion of general issues and information exchange among the SSABs. A major topic on the agenda was planning for the national SSAB stewardship conference in Oak Ridge in Fall 1999. Other business included status updates on a variety of DOE-EM topics and a discussion session on the draft revised EM SSAB guidance.

# ORSSAB PUBLIC OUTREACH

ORSSAB invites public participation in Board activities and uses a variety of methods to solicit public involvement. Following are some of the methods and materials used by the Public Outreach Project Team to get the word out about ORSSAB and its activities.

Over 600 residents and organizations in counties surrounding the ORR receive the *Advocate* newsletter. Each issue features articles on DOE's EM activities and information about ORSSAB. The Board's information line, 865-576-4750, is available 24 hours a day to inform the public of all Board and team meetings. General information, meeting schedules, meeting minutes, and much more are available on the World Wide Web Home Page at <http://www.oakridge.doe.gov/em/ssab/>. To reach local groups interested in learning more about ORSSAB, the Public Outreach Project Team has developed a public presentation and organization list. A foldout brochure and a 6-minute video produced by the team augment the presentation materials, and ORSSAB solicits stakeholder opinions yearly through a special survey form developed by the team. The Board has also prepared a traveling display for use at public meetings and conferences.



*Presentations to local civic and governmental organizations are an important method for reaching out to and involving stakeholders in ORSSAB activities. Here, Rikki Traylor, standing, and Steve Kopp, seated front left, make a presentation to the Oak Ridge Local Oversight Committee.*



*Board members Steve Kopp and Lorene Sigal man the ORSSAB display at the 15th annual Oak Ridge Environmental Conference. The Board's 4x8 conference poster was developed this year to serve as a vehicle for spreading the word about ORSSAB activities.*



*This year the Board extended its outreach effort to include visits to the major DOE sites on the ORR. The first of these visits took place at the ETTP cafeteria in May 1999. Here, Charles Washington, far left, and Steve Kopp, far right, hand out ORSSAB literature to Luther Gibson, who joined the Board several months after this photo was taken.*

Getting the word out involves getting out into the community, into meetings of other organizations, and into the sites where EM work takes place. This year, Board members made a record number of presentations

and contacts with area stakeholders and organizations. Following is a list of those activities.

ORGANIZATION/EVENT	DATE	MEMBERS PARTICIPATING
<b>Briefings</b>		
Briefing for staff of U.S. Representative Zach Wamp	11/23/98	Pardue, Traylor
Briefing for staff of U.S. Senator Bill Frist	12/10/98	Kopp, Traylor
Briefing for staff of U.S. Representative Jimmy Duncan	1/11/99	Kopp, Traylor, Washington
Briefing for staff of U.S. Representative Van Hilleary	2/25/99	Kopp
Briefing for Tennessee Representative Don Ridgeway	3/17/99	Pardue, Kopp
Briefing for Tennessee Senator Ron Ramsey	3/17/99	Pardue, Kopp
Briefing for staff of U.S. Senator Fred Thompson	3/26/99	Kopp, Traylor, Washington
Briefing for staff of Governor Don Sundquist	3/26/99	Kopp, Traylor, Washington
<b>Presentations</b>		
Presentation to Oak Ridge City Council	11/9/98	Kopp, Sigal
Presentation to Anderson County League of Women Voters	1/5/99	Kopp, Sigal
Presentation to the Scarboro Environmental Justice Council	1/28/99	Kopp, Pardue, Washington
Presentation to the East Tennessee Economic Council	3/6/99	Pardue
Presentation to CROET	6/29/99	Pardue, Traylor
Presentation to Local Oversight Committee Board of Directors	7/1/99	Kopp, Traylor
<b>Other Events</b>		
Display at the Oak Ridge Environmental Conference	12/7–8/98	Kopp, Pardue, Peelle, Sigal, Traylor, Washington
Display at the ETTP cafeteria	5/5/99	Kopp, Washington
Display at the Tennessee Technology Summit	6/2–3/99	Joe Alexander
Display at the ORNL cafeteria	7/13/99	Gibson, Kopp, Washington
Participation in Scarboro Community Fun In The Sun Day	8/7/99	Washington

# PROJECT TEAMS

## BOARD PROCESS

The purpose of this team is to serve as the Board's forum for initial debate on issues involving Board process. The team's scope includes the following issues: bylaws, standing rules, Board meeting structure, staff interface (including handling requests for technical assistance), and standards and formats for submitting recommendations and comments to DOE.



*Team members, left to right: Rikki Traylor (Team Leader), Bob Peelle. Not pictured: Dave Mosby, Lorene Sigal.*

### Highlights & Activities

- Revised the Board's Mission Statement, Bylaws, Standing Rules, and Special Rules of Order (revised Bylaws were adopted by the Board in May 1999; revised Standing Rules and Special Rules of Order were adopted in September 1999)
- Developed standards and formats for submitting recommendations and comments to DOE
- Developed a procedure and form for handling technical assistance requests
- Developed draft travel guidelines and revised the travel form
- Developed suggestions on a training program for new Board members
- Planned the Board's annual retreat

## BUDGET & PRIORITIZATION

The ORSSAB Budget & Prioritization Team (including members of the public) is dedicated to understanding DOE's prioritization and budget systems. This includes learning about the prioritization process, understanding the underlying assumptions, reviewing the reasons behind the sequencing of projects, and studying the estimates behind the annual budgets. Understanding how DOE plans to make the most of its limited cleanup funds contributes to development of informed ORSSAB comments and recommendations on the annual budget process.



*Team members, clockwise from top left: Steve Kopp, Bill Pardue, Lorene Sigal (Team Leader), Bob Peelle (Co-Team Leader).*

### Highlights & Activities

- Established a working relationship with the Local Oversight Committee (LOC) Citizens Advisory Panel to facilitate information sharing on DOE budget issues
- Cosponsored and assisted DOE with the content of three public meetings on the EM budget process: "Overview of the 3-Year Budget" (February 8, 1999); "Life Cycle Baseline Planning and the FY 2001 Budget" (March 15, 1999); and "Life Cycle Baseline Preliminary Results and *Paths to Closure* Update" (April 26, 1999)
- Composed a letter to Jim Owendoff at DOE-HQ about the proposed amendment to the Nevada Test Site (NTS) Environmental Impact Statement (EIS) Record of Decision (ROD) (DOE/EIS-0243), urging that Oak Ridge be designated as an approved generator of wastes for disposal at NTS
- Met with Dan Berkovitz, DOE Deputy Assistant Secretary for Policy, Planning, and Budget, to discuss the DOE-ORO EM budget
- Drafted informal comments on the March 1999 Oak Ridge Operations Risk Profile (Appendix F of *Paths to Closure*)
- Drafted comments on the *Draft Accelerating Cleanup: Paths to Closure*

## HEALTH AND SAFETY

The purpose of this team is to (1) understand the health and safety aspects of the environmental activities in Oak Ridge and (2) communicate and disseminate resulting information to the community at large. The scope of the team is to address current and future health and safety issues related to EM Program activities.



*Team members, clockwise from top left: Bob Peelle, Donna Campbell (Co-Team Leader), Demetra Nelson (Team Leader), Charles Washington. Not pictured: Luther Gibson.*

### Highlights & Activities

Activities designed to support the team's purposes are as follows:

- Provide public accessible data to the community (fact sheets, articles, health studies)
- Assist DOE, the Agency for Toxic Substances and Disease Registry (ATSDR), LOC, or other agencies and organizations with communication and notification support for meetings
- Review results of area Toxic Release Inventory data sources
- Provide format modifications to DOE for the *ORR Annual Site Environmental Report*
- Participate in selective ATSDR Working Group sessions
- Contribute to and work in conjunction with authors of the *Scarboro Community Focus* newsletter
- Provide representation to and/or participation with Advisory Committee for Energy Related Epidemiological Research activities

Successes include the following:

- Responded to a request by DOE to provide compilation of format modifications for the annual report based on preliminary recommendations
- Integrated cross-section of organizations to facilitate information gathering and dissemination
- Retrieved additional data from EPA Region 4 regarding Toxic Release Inventory data
- Met and coordinated with interagency teams to promote unified participation in health-related issues
- Provided notification information regarding future meetings to DOE for coordination and input

### ON-SITE CERCLA WASTE DISPOSAL FACILITY

The purpose of this team is to study the on-site waste disposal cell being considered for the ORR and make recommendations concerning the design, siting, and waste acceptance criteria. The objectives of the team are as follows:

- Review the D2 proposed plan for the waste disposal facility
- Gather information on waste cells at Fernald and Weldon Spring via on-site tours
- Evaluate costs and additional negative impacts to other remediation projects if a ROD is not signed
- Participate in a scoping meeting with DOE and other stakeholders prior to public hearings on the final proposed plan
- Review any other CERCLA documents pertaining to the cell, and assess whether NEPA values have been properly incorporated
- Review the selected Phase II design



*Team members, clockwise from top left: Donna Campbell, Bill Pardue, Lorene Sigal, Bob Peelle (Team Leader). Not pictured: Steve Kopp (Co-Team Leader).*

### Highlights & Activities

The team drafted the following recommendations and comments concerning the proposed on-site waste disposal cell:

- Recommendation for Including Public Involvement in Proposals for the EM Waste Management Facility at the ORR
- Comments on the *Proposed Plan for the Disposal of Oak Ridge CERCLA Wastes* (DOE/OR/011761&D3)

Team members also met with DOE to help plan a public meeting on the proposed plan.

## PUBLIC OUTREACH

The purposes of this team are to (1) serve as a communication link between ORSSAB and the public, (2) educate the public concerning the role of ORSSAB, and (3) encourage public participation in ORSSAB. The team's approach is to identify individual stakeholders and local groups and choose appropriate vehicles to communicate with them.



*Team members, clockwise from top left: Steve Kopp (Team Leader), Rikki Traylor (Co-Team Leader), Bill Pardue, Anne-Marie Wiest, Charles Washington. Not pictured: Darrell Srdoc.*

### Highlights & Activities

This year the team made numerous presentations and participated in a variety of events in an effort to inform and involve the public in ORSSAB activities. A listing of presentations, briefings, and other events is included in the "Public Outreach" chapter of this annual report.

The team made extensive changes to the Board's Web site this year. Key additions include links to EM-related sites and the SWG home page; Board and project team meeting schedules, agendas, and minutes; and ORSSAB recommendations, comments, and publications.

In spring, team members worked with the Waste Management Team to set up a meeting with state legislators in Nashville to educate them about ORSSAB activities. As a result of that meeting, the chairs of the House and Senate environmental committees agreed to meet with the Board in Oak Ridge in the near future. The team helped secure a student representative for the Board from Oak Ridge High School.

The team issued five news releases on ORSSAB-related topics this year and produced the following materials:

- *Advocate* newsletter (including July's 12-page "Information Insert")
- *Many Voices Working for the Community* information booklet
- 4-color conference poster
- FY 1999 Stakeholder Survey
- 4-color posters with brochure pockets

## STEWARDSHIP

The purposes of this team are (1) to serve as the liaison between ORSSAB and the Stewardship Working Group (SWG) and (2) to organize the National SSAB Meeting on Stewardship.



*Team members, clockwise from top left: Bob Peelle, Lorene Sigal (Team Leader), Donna Campbell, Bill Pardue, Charles Washington.*

### Highlights & Activities

The Stewardship Special Project Team was extremely active in FY 1999. With the support of the whole SSAB, the team sponsored SWG, which continued work begun by the End Use Working Group (EUWG). SWG began meeting in March and plans to publish a second volume of the *Oak Ridge Reservation Stakeholder Report on Stewardship* by the end of December. The new report will follow up on outstanding issues discussed in the EUWG's *Final Report of the End Use Working Group* and the initial *Stakeholder Report on Stewardship*, both published in July 1998. See "Other FY 1999 Board Activities" for more information on SWG.

Following are other accomplishments:

- Stewardship paper presented at Waste Management '99 Conference
- Stewardship presentation made at SSAB Chairs' Meeting in Augusta, Georgia
- Stewardship presentation made at Idaho National Engineering and Environmental Laboratory CAB meeting
- Team member Lorene Sigal appointed to the Environmental Management Advisory Board Stewardship Committee
- Team member Lorene Sigal participated in DOE long-term stewardship workshop in Grand Junction, Colorado
- Stewardship presentation made at SSAB Chairs' Meeting in Richland, Washington

## WASTE MANAGEMENT

The objectives of this team are to study and make recommendations to the Board on the following topics: DOE-ORO access to NTS disposal facilities, transportation issues, TSCAI permitting and emissions, intersite discussions, equity, Federal Facility Compliance Act Site Treatment Plan milestones, waste management, on-site storage issues, and better ways of networking with other SSABs.



*Team members, clockwise from top left: Steve Kopp, Jack Bowden (Co-Team Leader), Ken Parks, Fred Creswick, Charles Washington, Bill Pardue, Randy Gordon (Team Leader). Not pictured: Robert Blaum, Rikki Traylor, Joe Alexander, Luther Gibson.*

### Highlights & Activities

The team drafted the following recommendations and comments during FY 1999:

- Comments Relative to Alternatives Within the Waste Management PEIS Settlement
- Comments on Draft Environmental Assessment for the DOE-ORO Receipt and Storage of Uranium Materials from the Fernald EM Project Site (DOE/ORO-2078)
- Comments on the NTS EIS ROD Amendment
- Recommendation on Stakeholder Statements from the 1999 SSAB Transportation Seminar
- Recommendation on Ranking of Barriers to DOE EM Progress
- Comments on Shipping Mixed Low-Level Waste (MLLW) from the NTS to the Oak Ridge TSCAI
- Comments on the Preapproval Draft Environmental Assessment: Intermodal Transportation of LLW to the NTS

Other activities included:

- Participation in the national SSAB Transportation Workshop in Cincinnati, Ohio
- Discussion of FY 1999 TSCAI Burn Plan, permitting, and emissions
- Joint proposal to initiate discussions with the NTS CAB regarding waste access to each site
- Joint effort with members of the Public Outreach team to set up a meeting with state legislators to inform them about ORSSAB activities

## WATERSHED CLEANUP

The objectives of this team are (1) to serve as the Board's forum for initial debate on issues involving watershed cleanup on the ORR and (2) to provide informed recommendations to the Board on those issues. The team's scope includes the following:

- Tracking all watershed documents and concentrating on the most important ones
- Reviewing application of NEPA on the ORR
- Reviewing reindustrialization of ETTP
- Following reuse of contaminated materials
- Considering worker and community health and safety as pertaining to watershed cleanup
- Addressing radiological standards for residual contamination



*Team members, standing: Fred Creswick (Team Leader), seated left to right: Charles Washington, Bill Pardue, Bob Peelle. Not pictured: Donna Campbell (Co-Team Leader), Pat Rush.*

### HIGHLIGHTS & ACTIVITIES

The issue of incorporation of NEPA values in CERCLA documents was reviewed with the help of Board member Lorene Sigal.

The following watershed cleanup documents were reviewed with the help of DOE and Bechtel Jacobs project managers:

- Bear Creek Valley ROD. The team expressed concern about apparent delays in obtaining concurrence from the regulatory agencies.
- Melton Valley D2 Proposed Plan (Draft 2). The team was concerned about reasons the regulatory agencies had rejected the first draft (D1) plan and why it was taking so long to develop the second draft (D2). There was also concern over DOE's response to the Board's previous comments on the D1 version. The team drafted new comments on the D2 version for Board concurrence and approval.
- Upper East Fork Poplar Creek Feasibility Study. This was a first look at this watershed, for familiarization and background.

# APPENDIX A: FY 1999 BOARD MEETINGS

The tasks facing DOE-ORO EM are varied and complex, and the numerous programs involved in cleanup work are constantly evolving to meet EM needs. Keeping up with all those programs and activities is a challenge in and of itself, and one way ORSSAB does so is by devoting time during each

monthly Board meeting for presentations by individuals who play key roles in cleanup and management of the ORR. Following is a list of FY 1999 presentations and a sampling of photos from Board meetings.

DATE	PRESENTATION	SPEAKER
October 7, 1998	Overview of ORO and the DOE Complex	Jim Hall, DOE-ORO Manager
November 4, 1998	Status of the ETTP Management & Integration Transition	Joe Nemecek, President, Bechtel Jacobs Company LLC
December 2, 1998	ORR Comprehensive Integrated Plan	Pat Parr, ORNL Area Manager
January 6, 1999	Canceled due to weather	
February 3, 1999	ORR Site Environmental Report for 1997	John Murphy, ORNL
March 10, 1999	Update on the ORNL Surface Impoundments	Jim Kopotic, DOE-ORO
April 7, 1999	Real Estate Land Actions at ORO	Katy Kates, DOE-ORO
May 12, 1999	Stewardship at DOE Sites	Jim Werner, DOE-HQ
June 2, 1999	Results of TRI Geographic Information Survey	Solomon Pollard, EPA Region 4
July 7, 1999	EM Integration Initiative	Cissy Perkins, DOE-ORO
August 4, 1999	Recognition Ceremony for Outgoing Board Members; New Member Orientation	Rod Nelson, DOE-ORO; Marianne Heiskell, DOE-ORO
September 1, 1999	Draft Environmental Sampling Plan for the Scarboro Community	Camilla Bond Warren, EPA Region 4



*Camilla Bond-Warren, EPA Section Chief for the DOE Remedial Section, discusses EPA's draft Sampling and Analysis Plan for the Scarboro Community at the September 1, 1999, Board meeting. Because EPA plays such a key role in environmental decision-making on the ORR, increased communication with the agency was an important goal for the Board in FY 1999.*

*In FY 1999, the Board cosponsored three public meetings on the DOE-ORO budget process. Here, Rick Ferguson, Planning and Controls Manager for Bechtel Jacobs Company, explains the DOE Environmental Management life cycle baseline at the April 26 meeting. More information on these meetings can be found in the Budget & Prioritization Team section of page 12.*



*Joe Nemec, President of Bechtel Jacobs Company LLC, gives a presentation on the status of management and integration (M&I) contracting at the November 4, 1998, Board meeting. DOE-ORO's change from management and operating to M&I contracting signaled a dramatic change in the way the Environmental Management Program performs cleanup activities on the Oak Ridge Reservation.*

*Leah Dever, DOE-ORO Manager, delivers an overview of current ORO activities and a look ahead at where the program's going in FY 2000. Ms. Dever's presentation was made at the October 6, 1999, Board meeting.*

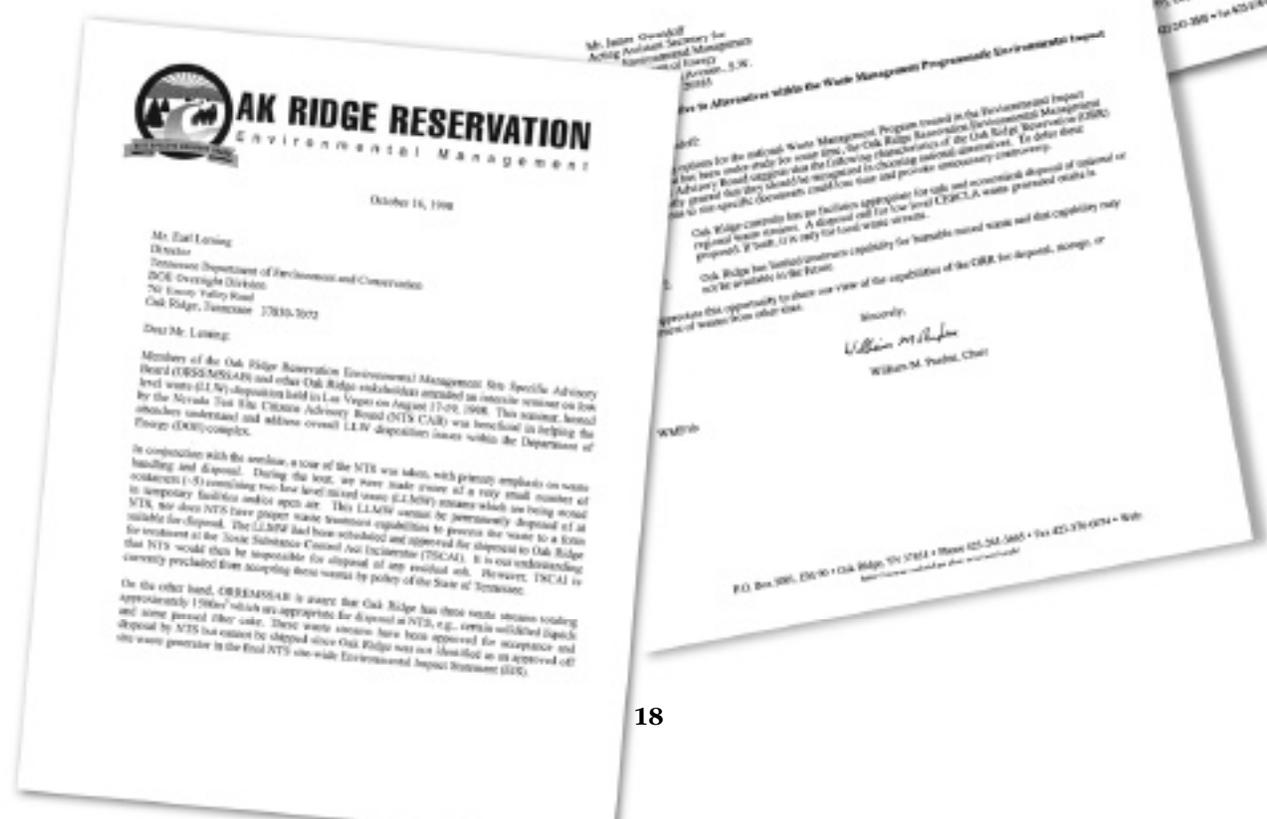


# APPENDIX B: FY 1999 RECOMMENDATIONS & COMMENTS

Since its formation, the Board has studied a variety of issues related to DOE EM activities. Review of an issue often includes detailed briefings in an open forum where Board members and the public may ask questions and discuss their views. Project teams prepare draft recommendations and comments for Board review, approval, and submittal to DOE. Meetings to prepare and approve recommendations and comments often consume many hours, and all are open to public participation.

Public participation is an integral part of the ORSSAB study and recommendation process. Each monthly Board meeting includes time for public input and response, and citizens attending the meetings are invited to ask questions and express views following technical briefings.

During FY 1999, the following recommendations and comments were generated by the Board. The recommendations, comments, and responses contained herein are abridged. Full text is available at the Information Resource Center and on the Board's Web page at <http://www.oakridge.doe.gov/em/ssab>.



C10/8/98.1, DATED 10/8/98

COMMENTS ON DRAFT DOE ORDER 435.1 AND DRAFT MANUAL DOE M 435.1

**BACKGROUND**

The Waste Cell Management Project Team began review of draft DOE Order 435.1 in late FY 1998, and completed its comments in early FY 1999. The Order (which was approved on July 9, 1999) sets forth the requirements that DOE programs must follow in managing radioactive waste and reflects advances in radioactive waste management practices and changes within DOE since the existing Order was issued in 1988.

The Order is of particular importance to DOE sites because it affects how wastes are defined. It imposes RCRA-like restrictions on LLW and requires that all LLW must be stored indoors and inspected regularly. A concern for Oak Ridge is that if DOE-ORO is required to divert money into indoor LLW storage it will be a huge drain on the budget. Whether "guidance" for the order plays out as "requirements" is also an area of concern. Following are excerpts from ORSSAB comments on the draft Order.

**COMMENTS**

In correspondence addressed to Martin Letourneau, Office of Waste Management (EM-35), the Board concurred in general with the intent of draft DOE Order 435.1 and felt that it represents a very positive step toward more responsible waste management within the DOE complex. Following are general comments on the Order and its *Radioactive Waste Management Manual* (DOE M 435.1).

1. Without being able to review the Implementation Guide specified in the Notice of Availability and Section 6 of the Order, this package cannot be realistically evaluated since details of implementation will be critical to safe operation of waste disposal.
2. Covered storage of LLW may prove to be extremely costly at the ORR without any added benefit if implemented in the strictest sense implied by the Order. Such a requirement should be based on risk estimates for the material and the storage interval under consideration.

3. Placement of wastes in covered and monitored enclosures may prove problematic and costly for our site if DOE-ORO is unable to ship wastes to disposal facilities due to factors beyond its control.
4. The Order should address whether or not DOE Orders are applicable or relevant and appropriate regulations/requirements in the CERCLA context of this Order.
5. We note that Chapter V of DOE Order 5820.2A on decommissioning was not canceled, as were other chapters. This raises a question regarding its status and relation to 435.1.
6. The Order should address stewardship at waste disposal sites that will require maintenance and surveillance beyond the plausible life of DOE.

The Board also provided 12 comments of administrative and technical nature. The most substantive comments addressed the Board's preference for (1) description of justification for site waivers; (2) application of a risk-based, graded management approach to conduct of operations and risk management to ensure efficient administration of the Order; (3) need for a new complex-wide plan for mixed waste; (4) market-driven decision-making in use of commercial disposal facilities rather than internal DOE decision-making; (5) use of either performance-based impact assessment (preferred by the Board) or risk-based impact assessment, but not both; (6) inclusion of "rough quantitative measures of suitability" regarding soil erosion for siting disposal facilities elsewhere; and (7) clarification of Oak Ridge's responsibility with regard to LLW facility design, storage time limitations, and treatment.

**RESPONSE**

Mark Frei, Acting Deputy Assistant Secretary for Waste Management, responded to the Board's comments in a letter dated July 13, 1999. The correspondence included, as an attachment, a summary of the most frequently received comments and DOE's responses to those comments. DOE received approximately 250 comments from 18 entities.

C10/16/98.2, DATED 10/16/98

COMMENTS ON SHIPPING MIXED LLW FROM NTS TO TSCAI

**BACKGROUND**

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ORSSAB members Randy Gordon, Bill Pardue, and Charles Washington attended an intersite LLW seminar in Las Vegas in August 1998, which was designed to help the SSABs understand DOE's overall LLW disposition issues. On a tour associated with the seminar, attendees were made aware of a small number of containers of LLW being stored in temporary facilities. These wastes cannot be processed or disposed of at NTS. Because TSCAI is currently precluded by State of Tennessee policy from accepting these wastes, the Board sent the following letter concerning these containers to Earl Leming, Director of the TDEC DOE Oversight Division.

**COMMENTS**

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During a tour of NTS taken in conjunction with the recent LLW disposition seminar, we were made aware of a very small number of containers (approximately 5) containing two MLLW streams which are being stored in temporary facilities and/or open air. This MLLW cannot be permanently disposed of at NTS, nor does NTS have proper waste treatment capabilities to process the waste to a form suitable for disposal. The MLLW had been scheduled and approved for shipment to Oak Ridge for treatment at TSCAI. It is our understanding that NTS would then be responsible for disposal of any residual ash. However, TSCAI is currently precluded from accepting these wastes by policy of the State of Tennessee.

On the other hand, ORSSAB is aware that Oak Ridge has three waste streams totaling approximately 1500m<sup>3</sup> which are appropriate for disposal at NTS, e.g., certain solidified liquids and some pressed filter cake. These waste streams have been approved for acceptance and disposal by NTS but cannot be shipped since Oak Ridge was not identified as an approved off site waste generator in the final NTS site-wide EIS.

We understand that the States of Tennessee and Nevada are endeavoring to reach an equitable solution to both of these problems. As an example, Tennessee might allow use of TSCAI for the NTS MLLW and in exchange, Nevada could entertain a modification by DOE of the final NTS site-wide EIS ROD that prevents receipt of wastes at NTS from Oak Ridge. ORSSAB believes that

such an agreement between Tennessee and Nevada would be exemplary. It not only would demonstrate good faith in starting to solve the difficult national issue of waste disposal but would demonstrate a significant example of equity in practice.

The attendant details of such an agreement are obviously beyond the realm of ORSSAB competency; however, we strongly endorse the endeavor and are hopeful of a successful agreement.

**RESPONSE**

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In lieu of a written response, Mr. Leming discussed the State's position on the issues involved in the Board's letter at the August 25, 1999, meeting of the ORSSAB Waste Management Project Team.

C10/16/98.3, DATED 10/16/98  
 COMMENTS ON THE DOE-ORO BUDGET

**BACKGROUND**

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In a letter to James Owendoff, Acting Assistant Secretary for EM, the Board expressed its concern that between FYs 1996 and 1998 DOE-HQ EM budget allocations to Oak Ridge have disproportionately declined in comparison to the overall EM Program (11% versus 6%). While recognizing that the total dollars allocated to the EM Program are controlled by Congress, the Board felt it important to make a statement to DOE-HQ about the allocation of those funds. Following are excerpts from the Board's letter.

**COMMENTS**

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ORSSAB believes it is imperative that the Congress and DOE fulfill their legal and moral obligations to adequately remediate the environmental legacy from 50 years of operation of nuclear facilities. While we recognize the reality of pressures to reduce the Federal deficit, the environmental insults that remain from operation of the nuclear complex must be drastically reduced or eliminated for the welfare and benefit of both present and future generations.

Division of funding should not be influenced solely by either the political influence of elected representatives from the vicinity of a site or by the vocal outcry of local residents. Instead, a realistic appraisal of each site should be the basis for funding decisions.

ORSSAB understands that DOE-HQ exerts its best efforts to convince Congress of the valid need for sufficient funding. Our concern is the apparent lack of DOE-HQ's understanding of the environmental factors that drive the need for Oak Ridge to receive a fair and proportional share of the overall budget. The factors which in aggregate are unique to Oak Ridge are: high average rainfall (50 inches per year), an extremely active and shallow groundwater system, extensive surface water bodies, a complex geology, and proximity to population centers and major highways. In addition, ORR contaminants have already migrated off the reservation in significant quantities. These releases have resulted in restrictions in normal public use of non-DOE property and include significant contamination of the Tennessee River.

Any failure to allocate sufficient FY 1999 funds at this time is critical to major progress in the cleanup at Oak Ridge. Our understanding of the currently expected FY 1999 budget allocation for Oak Ridge is that a shortfall in funds will lead to the failure to meet regulatory compliance milestones for the Oak Ridge EM Program. Indications from the State of Tennessee have been that such a situation would in turn lead to formal dispute resolution and/or the imposition of financial penalties. Either or both of these situations are considered extremely serious by ORSSAB.

FY 1999 is a critical juncture in the Oak Ridge cleanup program, and we are poised to make what we expect to be outstanding progress in the actual cleanup. At this time, the reduction in requested funding will set back the program in a disproportionate manner.

**RESPONSE**

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In response to concerns raised by ORSSAB and other stakeholders about DOE EM budgets, Dan Berkovitz, Deputy Assistant Secretary for Policy, Planning, and Budget, announced site visits by senior EM headquarters officials to facilitate stakeholder input on the budget process (correspondence dated February 5, 1999). Mr. Berkovitz subsequently met with ORSSAB members Lorene Sigal and other members of the Budget & Prioritization Team in Oak Ridge on March 15, 1999.

R11/5/98.1, DATED 11/5/98

**RECOMMENDATION FOR INCLUDING PUBLIC INVOLVEMENT  
IN PROPOSALS FOR THE ORR EM WASTE MANAGEMENT FACILITY**

**BACKGROUND**

The reality of an on-site CERCLA waste disposal facility drew nearer in August 1999 when DOE awarded a contract to Waste Management Federal Services to design, construct, operate, and close the facility. Before this selection, the ORSSAB On-Site CERCLA Waste Disposal Facility Project Team made the following recommendation to help ensure stakeholder input into the closed procurement process. The recommendation included, as attachments, Community Guidelines created by the EUWG and previous ORSSAB recommendations about the facility.

**RECOMMENDATION**

In correspondence addressed to Rod Nelson, DOE-ORO Assistant Manager for EM, ORSSAB recommended that DOE include the following in the Oak Ridge EM Management and Integration Contract Request for Proposal 23900-RFP-BC008, "Complete Design, Construction, and Operation of the EM Waste Management Facility":

1. If bidders are being scored on certain criteria, one of those criteria should be how they plan to incorporate stakeholder concerns and input.
2. The Community Guidelines created by EUWG and comments already made by the public regarding the waste management facility should be included as an appendix in the request for proposals. Comments already made by the public include the following:
  - a. "Recommendation to Site a Waste Disposal Facility on the Oak Ridge Reservation," contained in the *Final Report of the Oak Ridge Reservation End Use Working Group*;
  - b. ORSSAB Recommendation 97.4: "Elimination of the White Wing Scrap Yard Disposal Site from Consideration as a Location for the EM Waste Management Facility," issued February 5, 1997;
  - c. ORSSAB Recommendation R03/04/98.7: "Recommendation to Site a Waste Disposal Facility on the Oak Ridge Reservation," issued March 4, 1998;
  - d. ORSSAB *Vision, Critical Success Factors, and Principles*.

ORSSAB also recommended that a public meeting be held in January 1999 to explain the contracting process and status to stakeholders.

**RESPONSE**

In his response to the recommendation on August 6, 1999, Rod Nelson explained that while preserving the integrity of the procurement process places some restrictions on public access to procurement-sensitive information, "most of ORSSAB's goals for providing public input on this project will still be met. For example, each of the ORSSAB's recommendations concerning location of this facility has been incorporated into the ongoing procurement process."

C11/5/98.4, DATED 11/5/98

**COMMENTS ON THE PROPOSED PLAN FOR THE MELTON VALLEY WATERSHED, OAK RIDGE, TENNESSEE (DOE/OR/01-1724&D1)**

**BACKGROUND**

Comprising almost 1000 acres in the southern portion of the ORR, the Melton Valley watershed offers one of the most complex cleanup challenges for DOE. The watershed encompasses 35 separate areas and includes solid waste burial grounds, liquid pits and trenches, ponds, leak sites, White Oak Creek, White Oak Lake, White Oak Lake Embayment, and a variety of facilities.

As part of its scope of work, the Watershed Cleanup Project Team reviewed the D1 version of the Melton Valley Proposed Plan and submitted the following comments, which were approved by the Board and forwarded to DOE on November 5, 1998.

**COMMENTS**

In comments addressed to Rod Nelson, the Board expressed its approval of the plan's clarity and acknowledged that the plan is generally consistent with the end use recommendations developed by EUWG and adopted by the Board.

EUWG recommendations will be met in detail if (1) workers will be protected, (2) migration of contaminants within the valley and (3) released to the Clinch River will be controlled, (4) monitoring of residual contamination will be effective, (5) the EUWG Community Guidelines will otherwise be met, and (6) stewardship arrangements will be outlined in the plan sufficiently to allow the preferred remediation alternative to be judged.

The above six criteria are related in part to the regulatory framework administered by TDEC and EPA. We believe the Proposed Plan, and more completely the ROD, should be sufficiently specific on the planned remediation objectives for the various areas that when performance is measured, more than a decade from now, one will be able to determine whether the provisions of the ROD have been met.

The following comments were organized according to the criteria 1 through 6 above.

1. Protecting Workers. The Proposed Plan should indicate what level of risk to workers from contaminants is contemplated in the preferred alternative. The plan ... refers to the application of "recreational" exposure standards...[which] should be explained if it is retained. Further, the Board requested that the plan demonstrate consistency between the expected levels of residual contamination and worker safety standards. Finally, the Board asked that the plan indicate worker risks expected from future radioactive inventory.
2. Controlling Migration of Contaminants Within the Valley. The Board requested that the plan contain specific information on the monitoring concepts to be used, the extent to which migration will be controlled, the amount of transuranic waste to be removed, and the overall expectation of continued contamination from Bethel Valley.
3. Controlling Release of Contaminants to the Clinch River. The plan should detail the expected water quality for the various watershed streams, the levels of contamination expected to enter Clinch River from White Oak Creek, and the expected impact of flooding on valley remediation.
4. Achieving Effective Contaminant Monitoring. The Board stated that while the detailed monitoring plan should not yet be developed, the conceptual criteria for the overall monitoring should be stated so that a reader can judge sufficiency.
5. Meeting the EUWG Community Guidelines. The Board suggested DOE recognize the need for buffer zones around heavily contaminated areas and the need to obtain permission from the City of Oak Ridge when determining end uses.
6. Establishing Adequate Stewardship Arrangements. The Board recommended including a conceptual stewardship plan so that the public will understand the nature of the controls anticipated.

**RESPONSE**

DOE responded to each comment in correspondence dated January 7, 1999, generally stating that more specifics would be included in the next draft of the document, final decisions would be consistent with EUWG Community Guidelines, and a Land Use Control Assurance Plan will be developed to address stewardship.

C12/4/98.5, DATED 12/4/98

**COMMENTS ON THE PREAPPROVAL DRAFT ENVIRONMENTAL ASSESSMENT: INTERMODAL TRANSPORTATION OF LLW TO NTS**

**BACKGROUND**

NTS is expected to be the primary site for disposal of LLW generated at DOE sites, including Oak Ridge. Although Oak Ridge cannot presently ship to NTS because of a previous NEPA-based decision that ORR was not an approved shipper, expectations are that one day that restriction will be removed. The Board therefore thought it important to comment on this document, which addresses the other significant obstacle to shipment of LLW to NTS. Lacking a railroad route to NTS, DOE has proposed an “intermodal” approach, which involves shipping wastes by rail to a point in the Nevada or California desert and then loading wastes onto trucks for final movement to NTS.

**COMMENTS**

ORSSAB provided the following comments to Michael Skougard at the DOE Nevada Operations Office as input to the decision process on the use of intermodal transport of LLW from DOE sites. Comments on the specifics of the assessment were not made due to a lack of technical expertise required to perform a review of the extremely detailed data contained in the document. Instead, the Board made the following general observations:

1. The Board’s research has shown that rail transportation is less risky and less costly than highway transportation on a weight-distance basis; therefore, rail is the preferred method of LLW transport.
2. Alternative highway routing, notification of shipments (to the state), time-of-day restrictions, and inclement weather clauses may increase the cost of shipping but should be considered to improve safety and public perception and to minimize risk.
3. We strongly agree that routing of most highway shipments of LLW over Hoover Dam and through the heavily congested area of the interchange of US 93/US 95 and I-15 in the metropolitan Las Vegas area is counter-intuitive to the intent of minimizing risk to the public (although it may be less costly than alternate routes). Therefore, we believe that this route should be avoided if at all possible.

4. The Board agrees that the intermodal approach will reduce costs and risks and improve public perception.
5. The Nevada Operations Office should consider the negative factors of maximized rail shipping in the environmental assessment, including little DOE control over shipment notification and other safety aspects, costs established by tariffs, delays imposed by the railroad with no consideration of public risk, routing through metropolitan areas, and the uncertain condition of rail lines.
6. The cost assessment in the environmental assessment does not account for shipping of LLW from Oak Ridge, Hanford, or Idaho National Engineering and Environmental Laboratory. If waste is shipped from these sites after the ROD is in place, the relative costs of the alternatives may, in fact, change.

**RESPONSE**

A response to the Board was not requested, but the Board did ask to receive future revisions to the document, a copy of the comment response document (if one is prepared), and other information that may pertain to this issue.

C3/12/99.6, DATED 3/12/99

**COMMENTS ON THE PROPOSED PLAN FOR THE DISPOSAL OF OAK RIDGE CERCLA WASTES  
(DOE/OR/01-1761&D3)**

**BACKGROUND**

The On-Site CERCLA Waste Disposal Facility Project Team reviewed this plan for the construction of the facility in East Bear Creek Valley and submitted the following comments, which were approved by the Board and forwarded to DOE. This recommendation follows two previous recommendations on the facility: "On-Site Waste Disposal Facility on the ORR," March 1998, and "Recommendation for Including Public Involvement in Proposals for the ORR EM Waste Management Facility," November 1998.

**COMMENTS**

In a letter to Rod Nelson, the Board made general remarks, specific comments on the plan, and presumptive comments on the forthcoming ROD.

**General Remarks.** The Board continues to support the preferred alternative of construction of a facility in East Bear Creek Valley for disposal of most of the waste resulting from CERCLA remediation activities on the ORR. This alternative is considered less risky, less costly, and more efficient than shipping waste off site. Further, it sends the message that Oak Ridge accepts responsibility for waste it can accommodate and wants to minimize the amount and kinds of waste it ships to other facilities.

The proposed facility must be constructed to safely isolate contaminated waste, meet site-specific waste acceptance criteria, and there must be a long-term stewardship program in place for it.

**Proposed Plan.** Oak Ridge stakeholders expect to see a more definitive statement of the waste acceptance criteria or at least a statement of the criteria for their determination. The Board feels that the general reference to the remedial investigation/feasibility study and the addendum is not adequate.

**Record of Decision.** The Board expects more thorough treatment of the following items in the ROD:

1. Flood accommodations and erosion control
2. Clarification on how on-site and/or off-site disposal options will be evaluated in RODs and other decision documents for all future response actions requiring waste disposal
3. More information on the location and restoration of the soil borrow pit
4. Inclusion of DOE's off-site shipment policy
5. Inclusion of uncertainty factors associated with off-site disposal
6. Explicit statement of cell life span design in relation to life span of the contaminants
7. Clear references to applicable or relevant and appropriate requirements
8. Method of waste evaluation relative to the waste acceptance criteria
9. Plans for keeping long-term records of the origin, composition, location, and date of disposal of waste within the facility
10. Provisions for a temporary cap and drainage system for temporary water infiltration control
11. Provisions for long-term stewardship funding and details on institutional control over the waste facility

**RESPONSE**

The Board's comments were addressed by DOE at the January 14, 1999, meeting of the On-Site CERCLA Waste Disposal Facility Project Team and in correspondence to the Board dated August 20, 1999. In this letter, Rod Nelson wrote, "All of these comments were considered during preparation of the draft ROD for this project. Detailed written responses to each ORSSAB comment will be provided in the final ROD."

C3/12/99.7, DATED 3/12/99

**COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT FOR THE DOE-ORO RECEIPT AND STORAGE OF URANIUM MATERIALS FROM THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT SITE (DOE/ORO-2078)**

**BACKGROUND**

In January 1999, DOE announced it was considering plans to transfer approximately 3800 metric tons of uranium from Fernald to a DOE-ORO facility in FY 1999. The exact site had not been determined. The uranium consisted of both metal and an inert, insoluble powder, containing both depleted and slightly enriched uranium. Dale Jackson, DOE Executive Director for Enrichment Facilities, gave a presentation on the proposed shipment at the February Waste Management Project Team meeting.

- 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.

**RESPONSE**

No specific response was requested. DOE's decision was to store the uranium at the Portsmouth Gaseous Diffusion Plant.

**COMMENTS**

In analyzing the relative appropriateness of ORR for the receipt and storage of uranium materials from the Fernald EM Project Site, the Board made these comments:

- The distance from Poplar Creek to prospective storage sites at 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 environmental assessment 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.

C3/12/99.8, DATED 3/12/99  
 COMMENTS ON THE NTS EIS ROD AMENDMENT

**BACKGROUND**

ORR currently has more LLW in storage than any other DOE site, with no place to dispose of it in significant quantities. Storage of this LLW at ORR is extremely costly, and the funds for this storage could be better used in other parts of the ORR cleanup if the waste could be disposed of permanently, i.e., at NTS. Continued storage also prevents cleanup of that part of the ORR that is not suitable for permanent disposal.

NTS is expected to be the primary site for disposal of LLW generated at DOE sites, including Oak Ridge. However, Oak Ridge cannot presently ship to NTS because of a previous NEPA-based decision stating that ORR was not an approved “generator for disposal.” It is believed that when RODs on LLW are made in the next year, based on the Waste Management PEIS, that ORR will be designated an approved shipper.

After discussion of this subject by the Waste Management Project Team, the Board chose to make a statement about the importance of ORO being named an approved generator for disposal through amendment of the NTS EIS ROD.

**COMMENTS**

In a letter to James Owendoff, Acting Assistant Secretary for EM, the Board made the following statement:

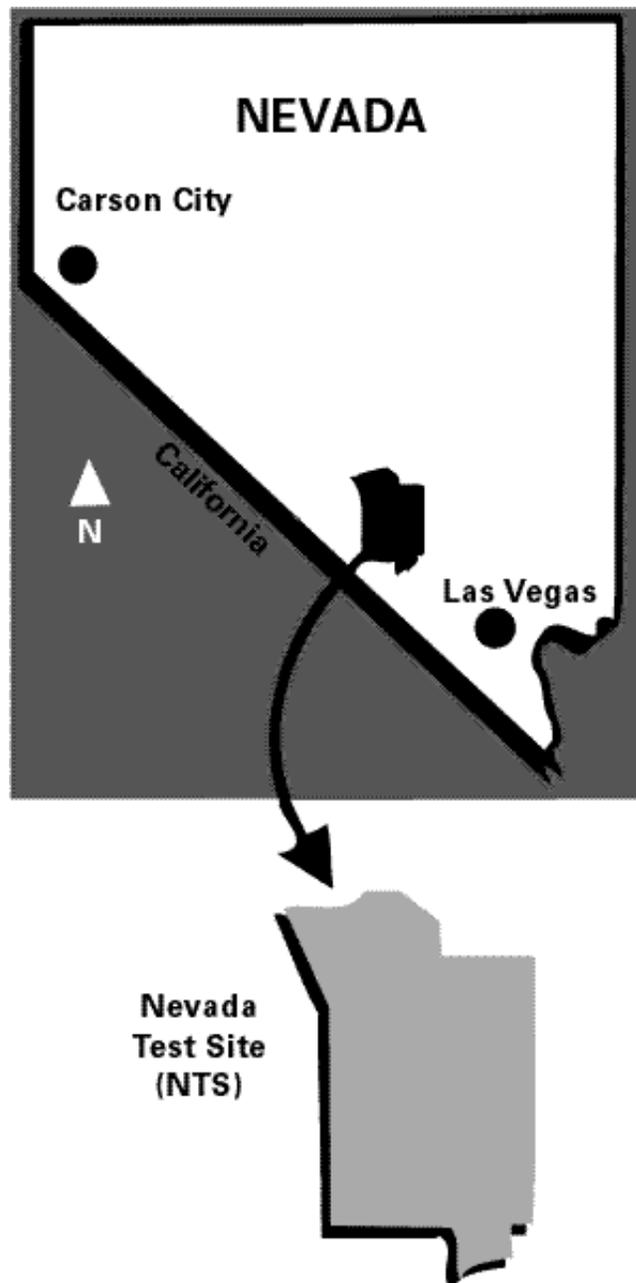
The amendment to the NTS EIS (DOE/EIS-0243) ROD is of the utmost importance to Oak Ridge stakeholders. Members of ORSSAB and other local groups have consistently declared that disposal of legacy waste is a top priority issue.

Whatever the reasons for not including Oak Ridge as an “approved generator for disposal” in the NTS EIS, the ROD amendment provides more than adequate justification for allowing Oak Ridge to ship limited legacy LLW to NTS.

We urge DOE to sign the amendment and thus demonstrate to Oak Ridge and the State of Tennessee that DOE takes its responsibility for disposal of legacy waste and remediation of contaminated sites seriously.

**RESPONSE**

No written response was requested.



C3/12/99.9, DATED 3/12/99

**COMMENTS RELATIVE TO ALTERNATIVES WITHIN THE WASTE MANAGEMENT PEIS**

**BACKGROUND**

During the August 1998 LLW seminar sponsored by the NTS CAB, additional information was requested of DOE on disposal options being considered by the department in its Waste Management PEIS. Following are ORSSAB comments on those options, which were sent to James Owendoff, Acting Assistant Secretary for EM.

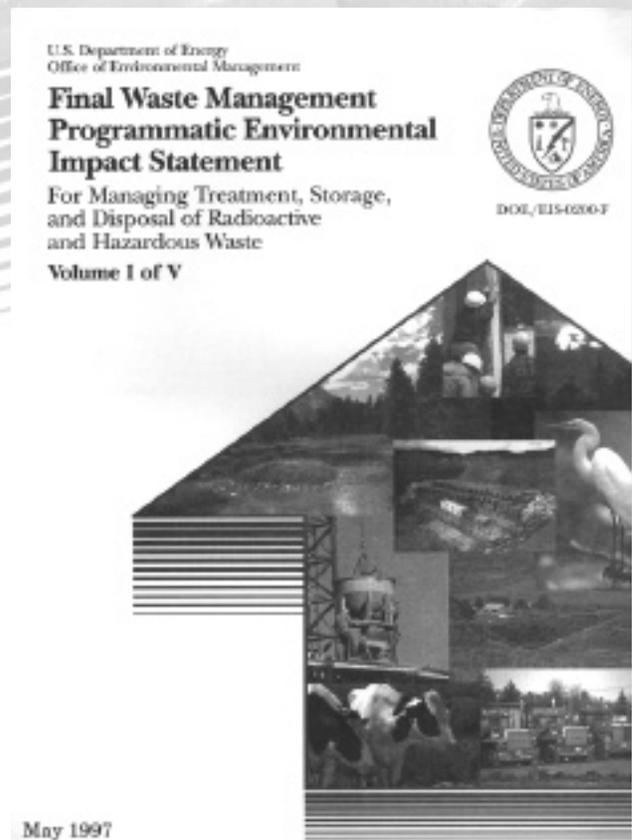
**COMMENTS**

In considering options for the national Waste Management Program treated in the EIS that has been under study for some time, ORSSAB suggests that the following characteristics of the ORR are sufficiently general that they should be recognized in choosing national alternatives. To defer these considerations to site-specific documents could lose time and provoke unnecessary controversy.

1. Oak Ridge currently has no facilities appropriate for safe and economical disposal of national or regional waste streams. A disposal cell for low level CERCLA waste generated onsite is proposed. If built, it is only for local waste streams.
2. Oak Ridge has limited treatment capability for burnable mixed waste and that capability may not be available in the future.

**RESPONSE**

No specific response was requested.



C5/17/99.10, DATED 5/17/99

COMMENTS ON THE SITE-WIDE EIS FOR MODERNIZATION OF THE Y-12 PLANT

**BACKGROUND**

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In this correspondence to Gary Hartman, DOE-ORO NEPA Documents Manager, the Board offered some suggestions for the scoping process of the Site-Wide Environmental Impact Statement (SWEIS) regarding the proposed modernization program of the Oak Ridge Y-12 Plant.

**COMMENTS**

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ORSSAB has not had the opportunity to fully understand all of the ramifications of the proposed modernization program at Y-12; however, we offer several comments for the scoping process of the SWEIS.

First, the concept of modernization and reducing the plant footprint is very appealing. This approach will permit substantial improvement in the ability of Y-12 to comply with and exceed current and revised regulatory requirements for operations, which will assure the health and safety of workers and nearby residents. Continued operation of the existing plant will likely require constant and costly upgrading and retrofit of 50 year old facilities to achieve appropriate protection of our citizens. It will be especially important to ORSSAB that the SWEIS quantitatively address the expected improvement in health and safety and environmental protection. We request that the EIS address whether the promise of improved health and safety will be achieved by the proposed action.

Second, modernization of the Y-12 Plant must be coordinated with EM Program plans for remediation of the site. Coordinated planning will lead to removal of unnecessary facilities, reduction of the footprint, and uncontrolled use of the eastern end of the site. However, such coordination will be a challenge. As pointed out on pages 18 and 19 of the summary of the *Final EIS for the Construction and Operation of the Spallation Neutron Source* (DOE/EIS-0247, April 1999), coordination with the EM Program “. . . could affect both the budget and schedule of the project.” Nevertheless, we expect the Y-12 Plant SWEIS to assess coordination of the planning and construction activities of the two programs.

Third, modernization and footprint reduction are consistent with the EUWG recommendation regarding Y-12 that was prepared by a widely representative group of area citizens and endorsed by ORSSAB. Please address this item in the SWEIS.

Finally, we support the economic benefits that the region will obtain from the safe and environmentally acceptable operation of the modernized Y-12. These and related socioeconomic efforts should be carefully addressed in the SWEIS.

In summary, we support a well-planned and carefully executed modernization of Y-12. We will reserve final comments until we are able to review the draft EIS.

**RESPONSE**

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No specific response was requested.

C6/2/99.11, DATED 6/2/99

**COMMENTS ON DRAFT ACCELERATING CLEANUP: PATHS TO CLOSURE, OAK RIDGE OPERATIONS OFFICE, MAY 1999**

**BACKGROUND**

The ORSSAB Budget & Prioritization Team was tasked as the Board's forum for discussion of Paths to Closure comments. In May, the team completed work on comments and forwarded them to the Board for consideration for approval and transmittal to DOE. In correspondence to Barbara Brower, DOE-ORO Program Integration Team Leader, the Board made 18 specific comments on the text of the document plus the following general comments.

**COMMENTS**

ORSSAB reviewed *Accelerating Cleanup: Paths to Closure, Oak Ridge Operations Office, May 1999*, and the May 1999 iteration of Appendix F: "Public, Environment, and Worker Hazards and Risks." We found the 1999 Paths to Closure document to be well organized and well written, and we are particularly pleased to find stakeholder interests embedded in the Paths to Closure strategy (e.g., end use and stewardship). The assumptions upon which the 1999 EM Program is based are clearly stated, and the new life cycle baseline strategy provides stakeholders with a road map to remediation actions and a way to judge progress. We applaud the construction logic approach for sequencing and prioritizing the work.

We recognize that progress is dependent on adequate funding and that \$600M is required to meet the near-term compliance drivers at all facilities. We urge DOE-ORO to do everything in its power to ensure that Oak Ridge gets sufficient funds to implement the baseline strategy. As stakeholders, members of the Board will continue to communicate Oak Ridge needs to Congress and DOE-HQ.

We are anxious for DOE to move ahead with remediation of the contaminated areas on the ORR. To that end, we urge DOE, EPA Region 4, and the State of Tennessee to quickly resolve remedial/watershed decision differences as they arise.

We note that a validation team consisting of outside reviewers will complete its review of the life cycle baseline in June 1999. The Board requests a copy of the validation team report. We also urge the team to review Appendix F. Several ORSSAB members provided informal comments to DOE on the April iteration of Appendix F. The May iteration is somewhat improved. Nevertheless, the data in Table 1 should be reviewed for accuracy. We are including some comments on the ORR portion of Appendix F, which at some points seriously misrepresents the existing situation.

**RESPONSE**

No specific response was requested.

R6/2/99.2, DATED 6/2/99

**RECOMMENDATION ON THE ORR ANNUAL SITE ENVIRONMENTAL REPORT FOR 1997**

**BACKGROUND**

Study of this document began in the ORSSAB Health & Safety Team in February, and in May an ad hoc committee was formed to comment on the report. The committee's goal was to help DOE improve the format and content of the 1998 report, which was already in the works at that time.

**RECOMMENDATION**

In a 6-page recommendation addressed to Tim Joseph, a DOE-ORO Senior Scientist, the Board made general and specific comments on the current document and suggestions for future reports. Following are excerpts from Board comments.

**The current report:**

- A summary of each chapter is needed, and the abstracts now included might be called subtitles.
- To assist the reader, summary statements should be made, with reference to other reports for details.
- The illustration regarding the pathway of mercury to local residents through fishing in the Clinch River and Poplar Creek needs to be elaborated upon. Issues that need explaining include the species-specific mercury take-up potential of sunfish, comparison of the mercury content of that site with others downstream, and whether the EPA reference dose quoted was for an adult or a fetus.
- A table of significant activities and a table of environmental compliance at the ORR could be included and updated annually to help increase readers' understanding.
- Discuss in-house and outside contractor quality assurance/quality control processes.

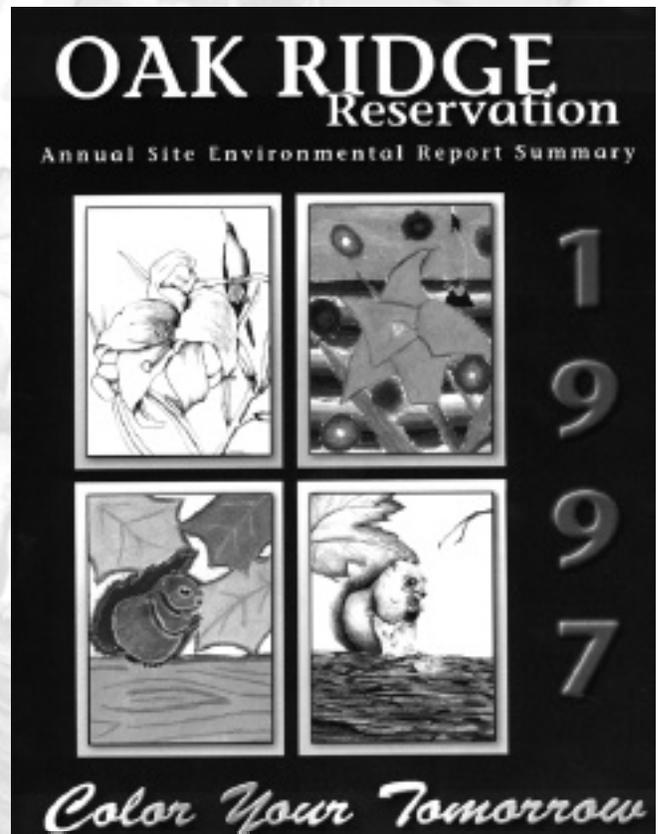
**Future reports:**

- A goal of future reports should be to indicate the level of success demonstrated in the EM Program. Further, a qualitative statement should be made about the general environmental state of the ORR.
- Future summaries should take special care with extra sections to provide necessary background for layman readers to sufficiently understand the topic at hand.

- The maximum dose for airborne releases should be identified as a product of the Clean Air Act's National Emission Standards for Hazardous Air Pollutants.
- The public involvement material should include the SSAB, and updated material on the future use of contaminated lands.

**RESPONSE**

No specific response was requested.



C7/7/99.12, DATED 7/7/99

COMMENTS ON THE ROD FOR DISPOSAL OF ORR CERCLA WASTE, OAK RIDGE, TENNESSEE, MAY 1999 (DOE/OR/01-1791&D1)

#### **BACKGROUND**

The On-Site CERCLA Waste Disposal Facility Project Team reviewed the ROD and submitted the following comments, which were approved by the Board and forwarded to DOE. This recommendation follows three previous recommendations on the facility: "Comments on the *Proposed Plan for the Disposal of Oak Ridge CERCLA Wastes*," March 12, 1999; "On-Site Waste Disposal Facility on the ORR," March 1998; and "Recommendation for Including Public Involvement in Proposals for the ORR EM Waste Management Facility," November 1998.

#### **RECOMMENDATION**

The Board made a number of specific remarks on the text of the document plus the following general comments.

While this D1 iteration of the ROD has incorporated NEPA values and generally responded to public comments and concerns, there remain some outstanding issues that should be resolved in the next iteration of the ROD. Some of our comments, particularly those involving stewardship, seem quite important. While DOE may not easily solve the problem of guaranteed funding for "perpetual care," there needs to be a very clear commitment to take those actions known to be required.

The stabilization, regrading, and revegetation of the borrow area are given short shrift. Such restoration is difficult at best and although a reference is given for restoration of the West End Borrow Area, we request that this ROD include description and discussion of a restoration plan. If restoration of the existing West End Borrow Area and the additional 12 to 18 acres required for the waste disposal facility depends on topsoil from elsewhere, the impacts on the source of that soil must be considered in the ROD.

The ROD must clearly state that the waste disposal site will remain within federal jurisdiction. The discussion of deed restrictions suggests the possibility of other ownership of the site after facility closure. Please include a complete discussion of deeds and deed restrictions as they relate to contaminated federal property. Also, include discussion of DOE-ORO plans for deed

description and filing with the appropriate local government authority.

Relegating details of closure and the long-term surveillance and maintenance program to post-ROD documentation is unacceptable. Post-ROD documentation has no legal standing and is not part of the administrative record. Thus, the public may not have access to post-ROD documents and will not know what to expect when on-site waste disposal is completed in either 2011 (low-end scenario) or 2033 (high-end scenario). Addressing this important issue in the ROD to build the Bear Creek Valley Waste Disposal Facility is necessary to gain Board approval.

Our concern for keeping long-term records of the origin, composition, location, and date of disposal of waste within the facility is not adequately addressed in the survey plat and post-closure notices sections. Furthermore, the DOE response to our comment depends on post-closure plans, which we find unsatisfactory.

Oak Ridge stakeholders have devoted a lot of time to stewardship for the contaminated areas on the Reservation and the DOE-ORO EM Program has supported these efforts. In our comments on the Proposed Plan we asked for more discussion and detail of stewardship, institutional and physical controls, and long-term funding for the waste disposal facility. The ORSSAB finds that description and discussion of long-term stewardship in the D1 ROD is inadequate. We expect the Waste Disposal Facility ROD to contain a more precise discussion of stewardship and long-term post-closure funding for the waste facility.

The ROD should describe and discuss buffer zone requirements for the waste disposal facility.

#### **RESPONSE**

A letter of acknowledgment from DOE was received on 8/20/99, noting that a detailed response is forthcoming.

R7/7/99.3, DATED 7/7/99

RECOMMENDATION ON STAKEHOLDER STATEMENTS FROM THE SSAB TRANSPORTATION WORKSHOP, MAY 1999

**BACKGROUND**

In May 1999, ORSSAB participated in a national SSAB transportation workshop in Cincinnati, Ohio, sponsored by the Fernald CAB. The goals of the workshop were to (1) improve understanding of transportation-related issues and decision-making processes, (2) foster dialogue among SSABs about national transportation issues, and (3) identify joint issues and concerns and begin to draft joint recommendations for the resolution of those concerns. Following the workshop, the eight "Stakeholder Statements" generated by workshop attendees were sent to participating SSABs. ORSSAB voted to endorse all eight statements and forwarded them to DOE-ORO for consideration.

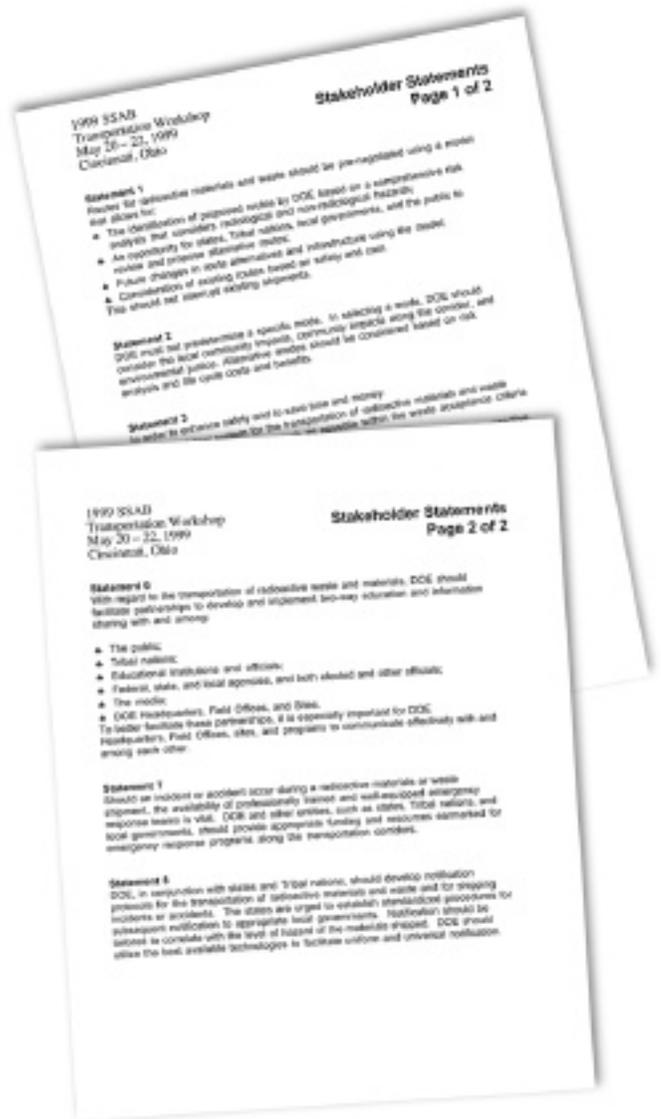
**RECOMMENDATION**

Following is a summary of the Stakeholder Statements, which relate to shipment of radioactive wastes and materials.

1. Transportation routes should be pre-negotiated using a model that allows for (1) identification of proposed routes, (2) an opportunity for stakeholders to review and propose routes, (3) future changes in routes and infrastructure using the model, and (4) consideration of existing routes based on safety and cost.
2. DOE must not predetermine a specific route.
3. Transportation protocols and container systems should be standardized.
4. Risks for transport of radioactive materials should be estimated using up-to-date, independently verified methods.
5. DOE should discuss policy initiatives, planning, and implementing activities with stakeholders.
6. DOE should facilitate partnerships, education, and information sharing with stakeholders, media, and DOE sites.
7. DOE and concerned other entities should earmark resources for emergency response programs along transportation corridors.
8. DOE and other concerned entities should develop notification protocols for shipping incidents or accidents.

**RESPONSE**

DOE response is forthcoming.



## APPENDIX C: ABBREVIATIONS

ATSDR	Agency for Toxic Substances and Disease Registry
CAB	Citizens Advisory Board
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CROET	Community Reuse Organization of East Tennessee
DOE	U.S. Department of Energy
DOE-HQ	DOE-Headquarters
DOE-ORO	DOE-Oak Ridge Operations
EIS	Environmental Impact Statement
EQAB	Environmental Quality Advisory Board
EM	Environmental Management
EPA	U.S. Environmental Protection Agency
ETTP	East Tennessee Technology Park
EUWG	End Use Working Group
FY	fiscal year
LLW	low-level (radioactive) waste
LMES	Lockheed Martin Energy Systems, Inc.
LOC	Local Oversight Committee
MLLW	mixed low-level radioactive and hazardous waste
NEPA	National Environmental Policy Act
NTS	Nevada Test Site
ORNL	Oak Ridge National Laboratory
ORR	Oak Ridge Reservation
ORSSAB	Oak Ridge Site Specific Advisory Board
PEIS	Programmatic Environmental Impact Statement
ROD	Record of Decision
SWEIS	Site-Wide Environmental Impact Statement
SWG	Stewardship Working Group
TEC/WG	Transportation External Coordination Working Group
TDEC	Tennessee Department of Environment and Conservation
TSCAI	Toxic Substances Control Act Incinerator

## ORSSAB MEMBERSHIP



*ORSSAB members and ex officios, left to right: Ken Parks, Joe Alexander, Bob Peelle, John Owsley, Donna Campbell, Pat Rush, Luther Gibson, Charles Washington, Robert Blaum, Fred Creswick, Steve Kopp, Connie Jones, Randy Gordon, Marianne Heiskell, Rod Nelson, Lorene Sigal, Bill Pardue, Demetra Nelson, Jack Bowden, Jeff Cange, Dave Mosby, Darrell Srdoc. Not pictured: Jake Alexander, Rikki Traylor, Anne-Marie Wiest.*

### **JAKE ALEXANDER**

Jake is a regulatory compliance manager with BNFL in Oak Ridge and a member of the adjunct faculty of the University of Tennessee's Engineering Graduate School. He serves on the Oak Ridge Health Agreement Steering Panel and is a former member of EQAB.

### **JOE ALEXANDER**

Joe is owner of Off Road Equipment Parts and the former Vice President for Royal Brass and Hose in Knoxville. Since retirement from the distribution company, he has raised beef cattle in Loudon County. Joe's term of service expired in July 1999, and he chose not to be reappointed to the Board.

### **ROBERT BLAUM**

Robert is a Roane County resident and a pipe fitter for Lockheed Martin Energy Systems, Inc. (LMES). He belongs to the Local Union 718.

### **JACK BOWDEN**

Jack is retired from the U.S. Army Reserves and raises cattle in Loudon County. He served as the past president and is a current member of Lenoir City Chamber of Commerce. Jack's term of service expired in July 1999, and he chose not to be reappointed to the Board.

### **DONNA CAMPBELL**

Donna resides in Harriman and is a librarian for Foster Wheeler Environmental Corp. Previously, Donna was on the faculty at the College of William and Mary and a librarian at several libraries. Donna's term of service expired in July 1999, and she chose not to be reappointed to the Board.

### **JEFF CANGE**

Jeff is an Anderson County resident and a project manager/technical specialist. He holds a masters degree in geology and water resources engineering and is a registered professional geologist.

### **FREDERICK A. CRESWICK**

Fred is a retired mechanical engineer, with expertise in research and development of energy use and emission control. He was leader of the Watershed Cleanup Team in FY 1999. Fred's term expired in July 1999, and he chose not to be reappointed to the Board.

### **LUTHER V. GIBSON, JR.**

Luther holds an M.S. degree in chemical engineering and works in the LMES Analytical Chemistry Organization. He has worked for DOE contractors for 23 years on environmental technologies. He was 1998-99 chair of the East Tennessee Chapter of the Air & Waste Management Association.

### **RANDY GORDON**

Randy is owner of Abco Screen-Print and Embroidery and Blue Springs Realty in Ten Mile. He served as a councilperson and vice mayor for the city of Kingston, where he worked with EPA on several issues affecting the area. Randy served as leader of the Waste Management Team in FY 1999.

### **STEVE KOPP**

Steve is a Senior Project Manager for Parsons Infrastructure and Technology Group. He is an attorney with more than 24 years of experience in the environmental health and safety regulatory field and is immediate past Chair for the Citizens' Advisory Panel of the LOC. Steve will serve as Board Chair in FY 2000.

**DAVID MOSBY**

Dave is a project manager with the LMES, where he manages multi-discipline facility support projects at the Y-12 Plant. He serves as a community representative for the NAACP. Dave is also vice president of the Oak Ridge Regional Planning Commission and chairs the zoning committee.

**DEMETRA NELSON**

Demetra lives in Oak Ridge and is a senior scientist for Radian International. She is a member of Spurgeon Chapel AME Zion Church and Alpha Kappa Alpha Sorority Inc. Demetra served as leader of the Health & Safety Team in FY 1999 and will serve as Board Vice Chair in FY 2000.

**BILL PARDUE**

Bill is retired from the nuclear research and development field but is currently consulting for the environmental industry. He is a member of the East Tennessee Environmental Business Association and is a former member of the DOE Community Leaders Network. Bill served as ORSSAB Chair in FYs 1998 and 1999 and as Vice Chair in FY 1997.

**KENNETH E. PARKS**

Ken is a truck driver for LMES. He is a member of the Teamsters Union. He is a former member of Kingston City Council and is currently a member of the Tennessee Auctioneers Association. Ken's term of service expired in July 1999, and he chose not to be reappointed to the Board.

**BOB PEELLE**

Bob is a retired nuclear physicist. He served for 22 years on the Roane County Commission and is a member of the Oak Ridge Health Agreement Steering Panel. Bob was the first ORSSAB Chair in 1995-96. Bob's term of service expired in July, and he chose not to be reappointed to the Board.

**PAT RUSH**

Pat served on the City Charter Commission in FY 1985–86 and has served on the Oak Ridge City Council since 1987. She was leader of the ETTP Project Team in FY 1997–98 and is a member of the Altrusa Club of Oak Ridge. Pat holds a degree in physics and mathematics.

**LORENE SIGAL**

Lorene retired from ORNL, where she worked as an ecologist. Her background includes work with the DOE Office of NEPA Oversight. Lorene served as leader of the Budget & Prioritization Team in FYs 1998 and 1999 and as leader of the Stewardship Team in FY 1999. She is also leader of SWG.

**DARRELL SRDOC**

Darrell is a Loudon County resident and a quality assurance manager for GTS Duratek. He holds a B.S. in Metallurgical Engineering Technology. For 16 years Darrell has been involved in quality assurance, engineering, program management, and management systems integration in and around DOE facilities.

**RIKKI TRAYLOR**

Rikki's background includes teaching and research. She is a member of the Citizen's Clearing House for Hazardous Waste and Amnesty International. Rikki served as leader of the Board Process Team in FY 1999. She was Board Secretary in FY 1999 and will serve in that capacity again in FY 2000.

**CHARLES A. WASHINGTON, SR.**

Charles lives in Oak Ridge and is a retired environmental engineer. He holds B.S. and M.S. degrees in chemistry and is particularly interested in the impacts of DOE's activities on the Afro-American community.

**ANNE-MARIE WIEST**

Anne-Marie joined the Board in May 1999, when she became ORSSAB's first student representative. She is in the Advanced Placement Environmental Science class at Oak Ridge High School and plays piccolo and flute. She enjoys horseback riding and helping out with Girl Scout clinics on horsemanship.

# FY 1999 MEMBERSHIP CHANGES

## SIX LONG-TIME MEMBERS RETIRE FROM THE BOARD IN FY 1999

This year, six Board members chose not to ask for reappointment: Joe Alexander of Knoxville, Jack Bowden of Lenoir City, Donna Campbell of Harriman, Fred Creswick of Ten Mile, Ken Parks of Kingston, and Bob Peele of Oak Ridge. The six were honored in a special ceremony at the August 4 Board meeting. All had served their entire terms of service. Three of the six—Joe Alexander, Donna Campbell, and Bob Peele—were charter members of the Board.



*Joe Alexander*



*Jack Bowden*



*Donna Campbell*



*Fred Creswick*



*Ken Parks*



*Bob Peele*

## SEVEN NEW FACES BRING FRESH PERSPECTIVES TO THE SSAB

August marked the appointment of five area residents to the Board: James Alexander and Jeff Cange of Oak Ridge; Robert Blaum of Rockwood; Luther Gibson, Jr., of Harriman; and Darrell Srdoc of Loudon. The appointments followed closely on the heels of two other additions. In March, DOE named Oak Ridge resident Dave Mosby to the Board, and in May ORSSAB added its first student representative, Oak Ridge High School student Anne-Marie Wiest.



*James Alexander*



*Jeff Cange*



*Robert Blaum*



*Luther Gibson, Jr.*



*Darrell Srdoc*



*Dave Mosby*



*Anne-Marie Wiest*



Oak Ridge Site Specific Advisory Board  
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