



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

October 9, 2008

Mr. Steve McCracken
Assistant Manager for Environmental Management
DOE-Oak Ridge Office
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

Dear Mr. McCracken:

Recommendation 175: Recommendation on the Integrated Facility Disposition Project

At our October 8, 2008, meeting, the Oak Ridge Site Specific Advisory Board approved the enclosed recommendation.

We appreciate your consideration of this recommendation and look forward to receiving your response by January 8, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Dixon".

Steven Dixon, Chair

Enclosure

cc/enc: Dave Adler, DOE-ORO
Cate Brennan, DOE-HQ
Mike Farmer, Roane County Mayor
Doug Frost, DOE-HQ
Pat Halsey, DOE-ORO
Connie Jones, EPA Region 4
Rex Lynch, Anderson County Mayor
James O'Connor, Oak Ridge City Manager
Melissa Nielson, DOE-HQ
John Owsley, TDEC



Oak Ridge Site Specific Advisory Board Recommendation 175: Recommendation on the Integrated Facility Disposition Project

Background

The Integrated Facility Disposition Project (IFDP) for the Oak Ridge Reservation envisions, over tens of years, the disposition of hundreds of facilities which are no longer useful. The Oak Ridge Site Specific Advisory Board (ORSSAB) welcomes and strongly supports the IFDP because it allows us to see the completion of the remediation effort and, in particular, because it can prioritize the efforts in a logical manner.

The Board is concerned, however, that the IFDP may not appropriately emphasize surveillance and maintenance of facilities in the time before disposition. The history of disposition efforts by the Department of Energy (DOE) shows that some facilities have been allowed to deteriorate until the work becomes extremely hazardous and costly. The current demolition of the K-25 building at East Tennessee Technology Park is an outstanding example of the problem, but is only noteworthy because it is a current problem.

The problem is not new. In 1992 a worker fell to his death through the roof of a reactor building on the Hanford reservation. In 1998 a worker died from carbon dioxide asphyxiation in an unused reactor building at the Idaho Site. In that case, the building was being used for storage and the carbon dioxide fire suppression system was thought to have been deactivated and drained. At the K-25 building, a worker had a potentially fatal fall through a floor that had deteriorated because of a leaky roof.

In addition to the hazard to workers, building deterioration can greatly increase the cost of eventual disposition. The K-25 building has deteriorated so badly from roof leakage that it must now be reinforced with structural steel to make demolition safely controllable.

Deterioration of a facility can also cause radioactive or other contamination to spread to uncontaminated areas or even to public areas, increasing eventual cost and hazard. It would seem obvious that preventive maintenance could have minimized these problems and would have decreased the eventual cost of disposition.

This concern also applies to facilities to be retained under historical preservation. These facilities must be maintained, or restored, and may be required to be decontaminated to allow public access. The historical preservation effort does not seem to be defined adequately to fit well into the IFDP.

Discussion

The IFDP is a commendable plan, and is strongly supported by the ORSSAB. The critical decision 1 (CD-1) concept deserves support from the community and the regulators. The Board believes, however, that surveillance and maintenance should be more strongly emphasized in the IFDP, and should be included in the way in which facilities are prioritized for disposition. If the maintenance cost to prevent deterioration of a facility before disposition was included in the final cost of disposition, the priority might change. Alternatively, if the increase in disposition cost because of lack of maintenance was included, the priority might change.

Preventive maintenance of unwanted facilities is not a major priority for DOE managers. All managers have important missions to be accomplished within their budgets and schedules, and preventive maintenance is easily deferred, especially for facilities that are to be demolished. Unfortunately, maintenance that can be deferred this year is very likely to be deferred next year, and the next. As an example, it is obviously not appealing to place an expensive new roof on a building that is to be demolished, even when demolition is decades in the future. This is especially true when the facility is to be turned over to a different management entity such as Environmental Management (EM). But even within EM the priorities tend to be to complete active remediation efforts on schedule rather than to maintain facilities slated for remediation in the far future.

While the problem outlined here is focused on the Oak Ridge Reservation, there is no reason to suspect that it does not occur to some degree at other DOE facilities. It would seem that the solution will require action by top management in DOE to make surveillance and maintenance a high priority in departmental budgeting.

Recommendation

1. ORSSAB supports approval of the CD-1 version of the IFDP proposal to expand the EM program on the Oak Ridge Reservation. The CD-1 concept appears well thought out, and, with proper funding, has the potential to be the best vehicle for long-term execution of the EM mission in Oak Ridge.
2. DOE should assure that facilities are not allowed to deteriorate before being turned over to EM if such deterioration would increase the final cost or hazard of disposition.
3. DOE should ensure that the budget for IFDP is adequate for conducting surveillance and maintenance of facilities slated for demolition so they don't deteriorate to unsafe conditions that could result in hazardous demolition or environmental release.
4. The prioritization task in the IFDP should include the effects of deterioration that can be expected to occur before the disposition activities begin. Deterioration can result in environmental releases, safety and health issues, and increased complexity and cost of decontamination and decommissioning of facilities. The savings that can be realized by preventing deterioration, or adjusting the priority for disposition of the facility, should be included as a key factor in prioritization.
5. In addition to the surveillance and maintenance concerns noted in recommendation 3, the ORSSAB believes that historic preservation issues related to the IFDP execution must be better defined and addressed as the next phase of project approvals and startup gets underway. Because the IFDP scope will essentially eliminate all of the legacy contamination and the associated older facilities in the DOE inventory, this will be the final chance for preserving key historical content associated with those past operations. While it was too early for detailed plans to be completed as part of the CD-1 package, preservation planning and critical interfaces with interested community partners and stakeholders must occur early in the next planning phase.
6. In order for the ORSSAB to fulfill its mission, it must be kept informed on the progress of the IFDP. Therefore, the ORSSAB requests that it receive periodic briefings on the status of the IFDP.