



Department of Energy

Oak Ridge Office
P.O. Box 2001
Oak Ridge, Tennessee 37831—

August 18, 2010

Mr. Ron Murphree, Chair
Oak Ridge Site Specific Advisory Board
Post Office Box 2001
Oak Ridge, Tennessee 37831

Dear Mr. Murphree:

**RESPONSE TO BOARD RECOMMENDATION 192: RECOMMENDATIONS AND
COMMENTS ON THE DRAFT 2010 REMEDIATION EFFECTIVENESS REPORT FOR
THE U.S. DEPARTMENT OF ENERGY OAK RIDGE RESERVATION**

Reference: Letter from Ron Murphree to John Eschenberg, "Recommendation 192: Recommendations and Comments on the Draft 2010 Remediation Effectiveness report for the U.S. Department of Energy Oak Ridge Reservation," dated July 15, 2010.

We appreciate the comments provided by the Oak Ridge Site Specific Advisory Board on the 2010 Remediation Effectiveness Report. Enclosed you will find a table of responses to these comments. Some comments resulted in changes in the text of the Remediation Effectiveness Report and will be reflected in the D2 version. Other comments were related to planning and prioritization of future work. Those comments were noted and will be considered as we plan future activities with our stakeholders.

If you have any questions or if we can be of further assistance, please contact me at 576-0742 or Dave Adler at 576-4094.

Sincerely,


John R. Eschenberg
Assistant Manager for
Environmental Management

Enclosure

cc:
Constance Jones, EPA
John Owsley, TDEC

Comment Resolution Form

Document Number: DOE/OR/01-2437&D1		Document Title 2010 Remediation Effectiveness Report for the U.S. Department of Energy Oak Ridge Reservation, Oak Ridge, Tennessee, Data and Evaluations	
Name of Reviewer:		Organization: SSAB	Date Comments are Due:
		Date Comments Transmitted:	
Comment No.	Sect/ Page	Comment	Response
GENERAL COMMENTS			
1	All Sections	Acronyms used on a page should be spelled out on the bottom of the page.	Comment noted. The document was prepared following Bechtel Jacobs Company document requirements (<i>Requirements for Bechtel Jacobs Company LLC Documents , Oak Ridge, Tennessee, BJC/OR-60/R4</i>).
2	BV Section	Consider that we should anticipate 2010 data to be forthcoming from deep wells South of the Clinch River.	Comment noted.
3	ETTP Section	There are some spelling and grammatical errors, and we recommend that a copy editor review it carefully.	Comment noted.
4	Sect. 1, Page 8	On the rainfall graph, the connecting line between years is meaningless. Please remove it.	Disagree. The presence of the lines connecting the monthly and the annual data points on the two graphs accentuates the contrasts in rainfall patterns through time.
5	Sect. 4, Page 43	Uranium Flux Balance for Bear Creek to be the major undertaking for 2010 is as it should be. Quarterly updates should be given to the ORSSAB Stewardship Committee.	Comment noted. DOE recommends that the SSAB Stewardship Committee schedule these updates in their work plan.
6	Sect. 7, Page 11	The elevated mercury in fish tissue is still an issue. Understanding then getting the mercury out of the system should be the number 1 priority for the Lower Watts Bar. Describe offsite mercury sources that may contribute to the mercury in fish tissue.	The comment refers to the Lower Watts Bar (LWB) Operable Unit, but the section and page number referenced are from the Lower East Fork Poplar Creek (LEFPC) section of the report. While Hg in fish tissue is a significant issue in LEFPC, it is not in LWB. Geologic and anthropogenic sources, such as coal-fired power-plant fallout, are known contributors to the environment in east Tennessee.
7	Sect. 4.2.1, Page 10, Table 4.4 Footnote	A statement is made that: "The Phase I Record of Decision (ROD) originally established the cadmium concentration performance standard as 3.9 µg/L. This standard changed to 0.25 µg/L due to change in the promulgated ambient water quality criteria." With the exception of the Biological Monitoring Program results, the Bear Creek Valley (BCV) section of the RER does not report surface water or groundwater monitoring results for cadmium.	Agree. A cadmium discussion was added to the text.

Comment No.	Sect/ Page	Comment	Response
8	Sect. 4.2.2.1.2, Pages 19-20	The release of uranium from the Bear Creek Burial Ground continues to be a major source contributor to the uranium released to Bear Creek and should be recognized as a high priority issue during the identification of priorities and annual allocation of budget.	Comment noted.
9	Sect. 4.2.2.1.2, Pages 19-20	A statement is made that: "119 of the 148 kg of uranium are accounted for at monitoring stations." The sampling conducted at Bear Creek Kilometer-9.2 (BCK) integration point (IP) indicates that in 2009 total uranium released to Bear Creek was 148 kg, which exceeds the BCV Phase 1 ROD goal of less than 34 kg/yr at the BCK 9.2 IP. The uranium contribution measured from North Tributary-8 is approximately 41% (60 kg). Groundwater inflows to Bear Creek from the karst geology is a significant contributor to the uranium flux. The uranium ROD goal at BCK 9.2 has not been met during the sampling period of FY 2001 through 2009. The sampling results underscore the following: 1) the importance addressing the Bear Creek Burial Grounds contribution to the uranium discharged to Bear Creek, and 2) the uranium contribution to Bear Creek due to karst geology of BCV	Comment noted.
10	Sect. 4.2.2.2, Page 25	We recommend inclusion of a table or graph of groundwater monitoring results for Zone 2 nitrates for sampling years 2000 through 2010 for GW-712, GW-713, and GW-714.	Agree. Data was included for FY 2000 through FY 2009, which is the end of the reporting period for the document.
11	Sect. 4.2.2.2, Page 27	A statement is made that: "A scarcity of groundwater monitoring wells in Zone 2 makes it impossible to precisely map and track groundwater contaminant transport pathways in that area." We recommend that DOE develop a plan to determine the appropriate locations to install additional groundwater monitoring wells in Zone 2 that will facilitate the capability to map and track groundwater contaminant transport pathways in Zone 2.	Text was amended.
12	Sect. 4.2.3.2, Page 40	A statement is made that: "S-3 Ponds Pathway 3 is an incomplete action; however, once action is complete, long-term stewardship requirements include control and restricted access. DOE needs to complete the action to install a trench at Pathway 3 for passive in-situ treatment of shallow groundwater." We recommend that DOE set a high priority for identifying an effective passive in-situ treatment method for shallow groundwater.	Comment noted.
13	Sect. 6.1.1, Page 7	We recommend that DOE identify completion of equipment and material removal from the Alpha 5 and Beta 4 buildings, as well as demolition and disposal of the buildings, as a high priority action during the upcoming annual budget allocation and priority identification process. Alpha-4 equipment and material removal should be identified as a priority following completion of the Alpha 5 and Beta 4 demolition.	Comment noted.