



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

April 15, 2010

Mr. John Eschenberg
Assistant Manager for Environmental Management
DOE-Oak Ridge Operations
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

Dear Mr. Eschenberg:

Recommendation 188: Recommendations and Comments on the Long-Term Stewardship Implementation Plan for the Department of Energy-Oak Ridge

At our April 14, 2010, meeting, the Oak Ridge Site Specific Advisory Board (ORSSAB) approved the enclosed recommendation regarding the adoption of the Long-Term Stewardship Implementation Plan for Oak Ridge.

ORSSAB stresses the importance of a long-term stewardship plan for the Oak Ridge Reservation and makes the following recommendations:

1. DOE-Oak Ridge should review and implement the plan (DOE/OR/01-2439&D0) as developed by Bechtel Jacobs, Co.
2. If DOE makes any changes to the plan DOE should seek ORSSAB comments before the plan is implemented.

Thank you for considering the plan and our recommendation and we look forward to your response by July 14, 2010.

Sincerely,

Ron Murphree, Chair, PE, CPE
rm/rsg
Enclosure

cc/enc:

Dave Adler, DOE-ORO
Cate Brennan, DOE-HQ
Mike Farmer, Roane County Mayor
Pat Halsey, DOE-ORO
Connie Jones, EPA Region 4

Local Oversight Committee
Rex Lynch, Anderson County Mayor
Melissa Nielson, DOE-HQ
Oak Ridge City Manager
John Owsley, TDEC



Oak Ridge Site Specific Advisory Board Recommendation 188 Recommendations and Comments on the Long-Term Stewardship Implementation Plan for the Department of Energy-Oak Ridge

Background

Long-term stewardship (LTS) is the set of activities necessary to protect human health and the environment from physical hazards, residual contamination, and wastes remaining following remediation of contaminated areas.

The Department of Energy (DOE) has made progress in addressing the environmental legacy as a result of waste generated by the industrial complex on the Oak Ridge Reservation (ORR) involved in the research, production, and testing of components used in nuclear weapons and in subsequent scientific and engineering research. However, in spite of this effort, the majority of sites will not be remediated to the point where they can be released for unrestricted use.

When remediation is complete, many sites will still require some level of LTS to ensure protection of human health and the environment from the remaining hazards or residual contamination. DOE is required by the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 to maintain these sites to protect human health and the environment.

For an unacceptable risk from residual contamination to occur, several conditions would have to exist. First, contamination must be present in some environmental media at levels determined to be unacceptable. Then, exposure to that contamination must occur. Exposure can occur when a human or ecological receptor comes in contact with the contamination and ingests it, inhales it, has direct contact with it, or in the case of radioactivity, is in sufficient proximity to it to intercept its radiation. Alternatively, exposure to contamination can occur when the contamination moves from its original location to potential human or ecological receptors.

Consequently, LTS is designed to:

- Prevent the receptor from encountering the residual hazard (generally through land use controls).
- Prevent the residual hazard from migrating to the receptor (generally through engineering controls).

The DOE-Oak Ridge Office, through its prime cleanup contractor Bechtel Jacobs, Co., has developed a Long-term Stewardship Implementation Plan for the DOE-Oak Ridge (DOE/OR/01-2439&D0).

This LTS Implementation Plan describes how LTS will be implemented on the ORR. Section 1 of the plan is the introduction; Section 2 contains background on the ORR and the remediation program; Section 3 describes the elements of LTS; and Section 4 describes how the elements of LTS will be implemented.

Discussion

Since October 2009, the Stewardship Committee of the Oak Ridge Site Specific Advisory Board (ORSSAB) has been reviewing the development of the implementation plan with Bechtel Jacobs, Co. The primary goal of the Stewardship Committee is to ensure the continual protection of remedial actions through the stewardship efforts of DOE. This plan has been put together by Bechtel Jacobs and the Stewardship Committee to ensure DOE retains **legal and financial responsibility for long-term stewardship on the ORR.**

Bechtel Jacobs has provided several versions of the plan and with each version committee members have provided comments, which, for the most part, have been incorporated.

The committee believes that the plan is ready for submission to the DOE-Oak Ridge Office for approval.

Recommendations and Comments

Based on the lack of an LTS program for sites with ongoing missions, ORSSAB stresses the importance of an ORR LTS Implementation Plan.

1. DOE-Oak Ridge Office should review and implement the Long-term Stewardship Implementation Plan for the Department of Energy-Oak Ridge (DOE/OR/01-2439&D0).
2. If DOE makes any changes in the plan, it is requested DOE should seek ORSSAB comments before the LTS Implementation Plan is accepted.