

May 9, 2013

Susan Cange Deputy Manager for Environmental Management DOE-Oak Ridge Office P.O. Box 2001, EM-90 Oak Ridge, TN 37831

Dear Ms. Cange:

Recommendation 215: Recommendation on Remaining Legacy Materials on the Oak Ridge Reservation

At our May 8, 2013, meeting the Oak Ridge Site Specific Advisory Board approved the enclosed recommendation on remaining legacy materials on the Oak Ridge Reservation.

The board recommends several points to consider concerning remaining legacy waste and materials, as well as several prioritized criteria concerning disposition of the waste.

Please see the enclosed recommendation for details. We look forward to your response by July 8, 2013, if at all possible.

Sincerely,

David Martin, Chair DM/rsg

Enclosure

Page 2

Recommendation 215 on Remaining Legacy Materials on the Oak Ridge Reservation

cc/enc: Dave Adler, DOE-ORO Cate Alexander, DOE-HQ Fred Butterfield, DOE-HQ Terry Frank, Anderson County Mayor Connie Jones, EPA Region 4 Melissa Nielson, DOE-HQ Melyssa Noe, DOE-ORO John Owsley, TDEC Mark Watson, Oak Ridge City Manager Ron Woody, Roane County Executive File Code 140



Oak Ridge Site Specific Advisory Board Recommendation 215: Recommendation on Remaining Legacy Materials on the Oak Ridge Reservation

Background

During the Oak Ridge Site Specific Advisory Board (ORSSAB) 2013 Planning Meeting, the Tennessee Department of Environment and Conservation asked the Board to consider alternatives for materials waiting for disposal. The Board agreed and asked the Department of Energy (DOE) to schedule a presentation during FY 2013. The DOE followed through with a presentation to the full board and a follow-up presentation to the Board's Environmental Management (EM) Committee.

At the November 14, 2012, ORSSAB meeting, DOE provided a presentation to the Board on the remaining legacy materials on the Oak Ridge Reservation, outlining what is considered remaining legacy material. Some of this material is considered waste and is best left for permanent disposal, while some is non-waste that has potential for re-use.

Most of the waste is under some type of regulatory requirement and must eventually be disposed. Until then, it can remain as is unless some overriding reason to act on it arises.

On January 16, 2013, DOE provided a follow-up to the ORSSAB EM Committee. The presentation went into more detail about several of the remaining waste and non-waste legacy materials, including but not limited to:

- Sodium shields stored at Building K-1313-F at East Tennessee Technology Park (ETTP)
- Sodium shields stored at Oak Ridge National Lab (ORNL)
- Shielded Transfer Tanks stored under a shed in Melton Valley
- Disposal Area Remedial Action soils stored under cover in Bear Creek Valley
- 28 vaults of low-level waste stored on the concrete 7822-K Pad at ORNL

These legacy materials are considered to be in safe storage, have no future mission, and are a cost liability to keep. The following points were made regarding remaining legacy materials:

- Legacy waste and material disposition represent a significant future cost, particularly for materials dependent on offsite disposal.
- Currently legacy waste and materials are being safely stored and monitored.
- Some materials present significant disposal or transportation challenges.
- Disposition efforts compete for funding with building demolition and environmental remediation efforts.
- An ORSSAB recommendation on criteria to use in setting disposition priorities is encouraged.
- ORSSAB input on potential near-term actions regarding legacy material disposition is encouraged.

Recommendation

Using the information provided at the November 2012 ORSSAB meeting and the January 2013 EM Committee meeting, the following recommendation is provided to the DOE Oak Ridge EM Program regarding remaining legacy materials.

In the near term:

- Maintain a table of legacy materials that includes description, current locations, and recognized obstacles to disposition.
- Where applicable evaluate potential for declassification of materials as a means to facilitate disposal or reuse.
- Consider moving materials currently stored outdoors into secure indoor areas to better control access and reduce damage from the elements.
- Characterize the Disposal Area Remedial Action soils to determine whether some or all can be used as fill material in the onsite waste disposal facility.
- Investigate whether waste materials stored in vaults on the 7822-K Pad at ORNL can be processed for disposal through the Transuranic Waste Processing Center.
- Begin the planning process for disposition of the cesium casks discovered during cleanup of the K-770 area at ETTP.

The ORSSAB recommends the following prioritized criteria for the disposition of Remaining Legacy Materials on the Oak Ridge Reservation:

- 1. Dispose to mitigate pressing environmental concerns.
- 2. Dispose to avoid regulatory liabilities.
- 3. Dispose while disposal paths are available.
- 4. Dispose when there is a high cost to maintain in place.
- 5. Dispose only when reuse options are prohibitive.