



Department of Energy

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

July 19, 2013

Mr. David Hemelright, Acting Chair
Oak Ridge Site Specific Advisory Board
Post Office Box 2001
Oak Ridge, Tennessee 37831

Dear Mr. Hemelright:

**RESPONSE TO YOUR LETTER DATED MAY 09, 2013, *RECOMMENDATION 215:*
RECOMMENDATION ON REMAINING LEGACY MATERIALS ON THE OAK RIDGE
*RESERVATION***

Reference: Letter from David Martin to Susan Cange, *Recommendation 215: Recommendation on Remaining Legacy Materials on the Oak Ridge Reservation*, dated May 9, 2013

We appreciate the recommendation provided by the Site Specific Advisory Board regarding the remaining legacy materials on the Oak Ridge Reservation.

The Oak Ridge Office of Environmental Management (OREM) shares your interest in expeditiously dispositioning waste and materials that are stored on the reservation. To this end, OREM has developed a comprehensive inventory of all waste/materials stored on the reservation and has prioritized this inventory for disposition. Our highest priority is to address those hazardous and/or radioactive waste that may pose a threat to the environment or could result in a violation of Federal or State laws. As such, we have undertaken an aggressive approach over the past year to reduce the inventory of legacy waste. Our approach begins with the research and review of historical information to ensure the accuracy of the classification of the waste/material as recorded. This effort has yielded the following results over the past year:

- Disposition planning is underway for three out of six waste streams previously identified as having no path to disposal
- Identified disposal paths for the remaining waste identified on the Polychlorinated Biphenyls Federal Facility Compliance Agreement
- Recycled or reused approximately 500 cubic meters of waste/material
- Identified the Environmental Management Waste Management Facility as a disposal outlet for a significant portion of the Disposal Area Remedial Action soils located in Bear Creek Valley
- Reduced the waste inventory covered by the Department of Energy/Tennessee Department of Environment and Conservation Compliance Agreement to four low-level waste streams

In addition, OREM has established a hierarchy for dispositioning the inventory to minimize disposition costs that includes:

- Reuse or recycle of waste or material
- Use of onsite Subtitle D landfills for final disposal
- Use of the Environmental Management Waste Management Facility for disposal
- Use of offsite disposal facilities

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By incorporating this hierarchy, OREM has dispositioned approximately 1,800 cubic meters of waste since September 2011 at a significantly reduced cost from previous baselines. Over this period of time OREM has dispositioned all regulated hazardous and mixed waste previously stored in outdoor locations as well as a large portion of low-level and sanitary waste stored in outdoor locations.

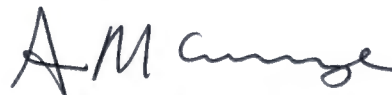
It is our intent to utilize a similar strategy for those wastes and/or materials that were not addressed during our initial effort. These would include but not be limited to sodium shields, shielded transfer tanks, cesium casks, and the vaults at 7822-K located at the Oak Ridge National Laboratory. As with the waste, we will validate the inventory and its classification; identify any potential risk to the worker, public, or environment as a result of continued storage; assess the risks of the current storage configuration; and prioritize the inventory for disposition accordingly.

OREM will face significant challenges as it continues to work off the remaining inventory. Challenges that constrain OREM's waste/material disposition progress include:

- Availability of treatment and/or disposal technologies (pathway for dioxins/furans)
- Availability of facilities with adequate hot cell capacity for processing high-activity radioactive waste (e.g., cesium casks)
- Budget constraints
- Competing priorities

It should be noted, however, that OREM, through the initiatives stated above, has positioned itself to cost-effectively disposition waste and materials as these barriers are cleared. If you have questions, or if we can be of any further assistance, please contact me at (865) 576-0742 or Dave Adler at (865) 576-4094.

Sincerely,



Susan M. Cange, Deputy Manager
Oak Ridge Office of Environmental Management

cc:

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