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JUN 24 2003

Ken Niles, Administrator
Nuclear Safety Division
State of Oregon
Oregon Office of Energy
625 Marion St. NE Suite 1
Salem, OR 97301-3742

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EDMC

RESPONSE TO COMMENTS ON ENVIRONMENTAL ASSESSMENT DOE/EA-1462 FOR THE ACCELERATED TANK CLOSURE DEMONSTRATION PROJECT

Dear Mr. Niles:

The U.S. Department of Energy (DOE), Office of River Protection (ORP) acknowledges receipt of the comments provided by the State of Oregon, Office of Energy (OOE) on the Draft Environmental Assessment (EA) for the Accelerated Tank Closure Demonstration (ATCD) Project. ORP believes the conduct of this project will enhance our knowledge of the activities involved in the closure of single-shell tanks at the Hanford Site. The ATCD Project will contribute to the DOE commitment to protect public health and the environment.

The OOE has provided several comments on the Draft EA for the ATCD Project. These comments, with the DOE responses, are enclosed. As appropriate, DOE has noted where changes have been made in the Final EA as part of our response.

DOE appreciates your interest in this project. If you have additional questions concerning the proposed action, please contact Mr. Robert Lober at 509-373-7949. Questions on the NEPA process can be directed to me at 509-376-6667.

Sincerely,

A handwritten signature in cursive script that reads "Paul F. X. Dunigan, Jr.".

Paul F. X. Dunigan, Jr.
NEPA Compliance Officer

TPD:RWL

Attachment

cc: Administrative Record

**Department of Energy Response to State of Oregon, Oregon Office of Energy
Comments on the ATCD Project Draft EA (DOE/EA-1462)**

The following is a listing of the specific comments made by the State of Oregon, Oregon Office of Energy and the DOE response to these comments. As appropriate, the comment responses indicate where changes in the final environmental assessment have been made.

Comment 1:

Since this project's purpose is to establish precedent for future tank closures, which will have very significant impacts, a detailed consideration of this question must be included in the environmental assessment.

Response:

The primary purposes of this project are:

- Field deployment of grout production and placement equipment.
- Placement and distribution of grout in tank.
- Physical response of tank residual to grout during placement.
- Worker/airborne exposure measurements/mitigation.
- Collect information on project costs and efficiencies

The Council on Environmental Quality (CEQ) and the DOE National Environmental Policy Act (NEPA) implementing orders and guidance are very specific that demonstration projects do not reach a level of investment or commitment that would likely determine subsequent development or restrict later actions. The purpose of this demonstration project is to obtain information and experience to better understand closure actions, not to establish precedent for future tank closures. The decision on future tank closures will not be made until after the Tank Closure EIS has been completed at which time DOE will issue a Record of Decision (ROD) that will identify how future tank closures will be accomplished. Furthermore, until the analysis of the Tank Closure EIS is completed, DOE cannot determine whether the impacts of final tank closure are or are not significant.

This demonstration project will not determine subsequent development or restrict later actions concerning the closure of C-106. Following retrieval, DOE and the Tri-Party Agreement (TPA) regulators will review the success of the retrieval efforts. If it is determined that sufficient waste has been removed from the tank, then DOE would proceed with the placement of the Phase I engineered fill portion of the demonstration. If it is determined that sufficient waste has not been removed to proceed with the demonstration, then DOE would not place any fill material in the tank and would suspend component closure activities for C-106 pending the completion of the Tank Closure EIS and issuance of the ROD.

The Tank Closure EIS is evaluating alternatives for closure of Waste Management Areas (WMAs) and the entire single shelled tank (SST) system. These alternatives include landfill closure, modified clean closure and clean closure. The Accelerated Tank Closure Demonstration (ATCD) Project does not foreclose implementation of any of these alternatives. This demonstration preserves all future options for final closure of C-106 while obtaining important information and protecting human health and the environment. The impacts of implementing a final closure action will be considered in the Tank Closure EIS. If removal of tanks under the clean closure option were selected then the volume of fill material in C-106 would be excavated along with the tank and surrounding soil. The impacts of implementation of this closure action are more appropriately addressed in the Tank Closure EIS since there are no final closure decisions being made as part of this demonstration project.

Comment 2:

The environmental assessment asserts, "The volume of initial fill material in C-106 that would be retrieved is not substantial in comparison to the volume of waste to be retrieved from all tanks." This single statement does not contain enough detail to support the contention of no significant impacts from this material. A more detailed discussion of this possibility needs to be included in this document.

Response:

The ATCD Project contemplates the retrieval of tank waste up to the retrieval goal of the Tri-Party Agreement (HFFACO). Even if retrieval exceeds the HFFACO goal, there are still benefits to be gained by placement of grout in C-106. This comment has been edited from the environmental assessment because retrievable grout is no longer part of the demonstration project. The ATCD Project will demonstrate field deployment of a Phase I grout formulation fill material for subsequent tank closures. Between 160 and 500 cubic yards of grout may be placed in C-106. The total volume of C-106 is approximately 4,000 cubic yards. The amount of grout to be placed in this one tank is not a substantial amount of material.

Comment 3:

For example, what materials are being considered as fill materials?

Response:

Specially formulated grout is going to be used in the Phase I fill. It is possible that a granular absorbent could be used to stabilize any free residual liquid as part of a top dressing. The Savannah River Technology Center (SRTC) is preparing the technical specifications for the tank fill formulations and placement that will be incorporated into a vendor specification. The SRTC development program will recommend a grout formula based on variables such as compressive strength, flow, gel time, set time, bleed water, air content, hydraulic conductivity, porosity and the applicability of incorporating sequestering agents.

Comment 4:

What is the ease of retrieval of these materials if future retrieval is necessary?

Response:

The ATCD Project is no longer considering the placement of a retrievable material. The Phase I grout placed during the ATCD Project would be retrieved if DOE determines in the Tank Closure EIS that tank C-106 is to be removed. The removal of an underground tank the size of C-106 that has stored radioactive waste would be difficult. The removal of tank C-106 would not be made more difficult with the Phase I grout in place. Benefits to placement of the Phase I grout in C-106 are that it would provide protection during tank removal by shielding workers from the residual waste in the tank. The removal of C-106 with the grout in place would not require any new technology beyond that used for tank removal only.

This demonstration project does not determine subsequent development or restrict later actions concerning the final closure of C-106. If the Tank Closure EIS selects landfill closure, this demonstration is consistent with implementation of that alternative. If the Tank Closure EIS selects clean closure, the volume of grout in the tank does not make removal of the entire tank impractical or impossible. Therefore, this demonstration preserves future options for final closure of C-106. This demonstration constitutes a component closure action to test Phase I of a landfill closure, but would not proceed to Phases II and III until after the Tank Closure ROD is issued.

Comment 5:

What will be the disposition of these materials if retrieval is necessary? Are they high-level waste?

Response:

If tank removal were selected for final closure in the Tank Closure EIS, then all material would be classified and disposed of in compliance with DOE Orders.