



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD/INL PROJECT OFFICE**
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

June 30, 2005

Kevin D. Bazzell
Federal Project Director
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A3-04
Richland, Washington 99352

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EDMC

Re: EPA Comments on Surplus Reactor Final Disposition Engineering Evaluation

Dear Mr. Bazzell:

Enclosed please find comments from the U.S. Environmental Protection Agency on the subject document. EPA finds that submittal of this document meets the intent of milestone M-093-25, which requires the submittal of an engineering evaluation by September 30, 2005.

EPA would like to highlight the importance of the U.S. Department of Energy (DOE) commitment made in the 1993 Record of Decision, where the intent was to complete final disposition consistent with the proposed cleanup schedule for remedial actions. Milestone M-16-00 requires remedial actions be complete by September 30, 2024, and EPA believes it is in the Tri-Parties' interests to set the schedule for final reactor disposition within the 2024 time frame.

If you have any questions, feel free to contact me at (509)376-8631.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Faulk".

Dennis Faulk
Remedial Project Manager

Enclosure

cc: Chris Smith, DOE
Jim Golden, BHI
Rick Bond, Ecology
Admin. Record: M-93 Milestone

EPA Comments on Surplus Reactor Final Disposition Engineering Evaluation

General Comments

- 1) The document contains little new information, but rather just updated information from the 1993 Record of Decision. EPA had expected a more thorough review of advancements in the decommissioning process. In addition, there is no discussion of the end-state workshops held last summer, where reactor disposition was discussed extensively.
- 2) Given the interest in this project, EPA recommends that the public be notified via the list-serve that this document is available.

Specific Comments

- 1) Page 15, Section 5.0, 3rd paragraph
This paragraph leads the reader to believe that the reactors may be left for up to 75 years before final disposition. This paragraph seems to be in conflict with DOE's intention to complete disposition consistent with the M-16-00 milestone time frame.
- 2) Page 16, Section 5.1.1
This section discusses sending the waste to the 200 Area burial grounds. It is not clear why this information was not updated to consider ERDF or ERDF –type costs/operations.
- 3) Page 23, 2nd paragraph
A statement is made that says one piece removal or in-situ decommissioning appear to be the most feasible. However, there is no information presented to support this conclusion. Please clarify.
- 4) Page 23, Section 7.0
These recommendations are written from a contractor perspective. Since this is a document from DOE to the regulatory agencies, the recommendations should be from the DOE, not their contractors.
- 5) Page 23, Section 7.0, 3rd paragraph
EPA disagrees that M-93-23 for K Reactor needs to be renegotiated as the basin work should be completed in time to support the safe storage removal action.