

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

www.BREDL.org ~ PO Box 88 Glendale Springs, North Carolina 28629 ~ Phone (336) 982-2691 ~ Fax (336) 982-2954 ~ BREDL@skybest.com

July 26, 2005

Jean Sulc, Chair
Savannah River Site Citizens Advisory Board
Building 742-A, Room 190
Aiken, SC 29808

Dear Ms. Sulc:

On behalf of the Blue Ridge Environmental Defense League and our members in the Central Savannah River Area, I would like to bring an urgent matter to the Citizens Advisory Board. The issue at hand is the ongoing environmental clean up at the Savannah River Site and its impact on SRS employees and the general public. The environmental cleanup has gone awry and tens of millions of tax dollars have been wasted. We call upon the Savannah River Site Citizens Advisory Board to use its powers to bring an end to a decade of delay at the old weapons plant.

Clean-up Process Wasteful and Will Fail to Meet Goals

The current Savannah River Site Environmental Management Integrated Deactivation and Decommissioning Plan (issued by WSRC in 2003) maps out the removal of 225 facilities at SRS by September 2006, when the current Westinghouse contract with DOE expires. But in April the DOE Inspector General issued an audit report on the status of the SRS clean up program which finds that this target will not be met without a major overhaul. More disturbing is the finding that about 67% of facilities deactivated and decommissioned by WSRC through August 2004 “posed little or no potential risk to the environment, workers or public” and 22 facilities that did pose risk had not even been scheduled for D&D. Further, the IG found that, had the Department concentrated on closing the high-risk facilities, it could have saved the taxpayers approximately \$2.2 million per year in avoided surveillance and maintenance costs.¹ The report’s principal findings:

We determined that the Department has performed deactivation and decommissioning activities on 55 facilities that posed no potential risk to the environment, workers, and/or the public and provided minimal reduction in surveillance and maintenance costs. Additionally, some of the facilities that did pose an environment, safety and health (ES&H) risk were not scheduled for closure or included in the scope of the current contract.² (emphases added)

For example, the facility which poses the largest potential environment, safety and health risk, the 242-H 1H Evaporator, will not be deactivated before FY 2007. Oddly, the main cafeteria, which posed no risk, was dismantled.

DOE-EM claims that the approach at SRS was similar to those at other accelerated closure sites (Rocky Flats, Fernald, Mound and Columbus). But comparisons with DOE-EM activities at other sites are misleading. For example, the Richland office lacks a comprehensive facility disposition plan and a discrete budget, rendering useless D&D cost comparisons between Hanford and SRS.

A Decade of Delays

There is a history of similar delays which dates back nearly a decade. A 1997 audit by the IG found similar pattern of inaction by the principal contractor (WSRC), leading to unnecessary costs for maintenance and surveillance. The purpose of this audit was to determine whether the Savannah River Operations Office and Westinghouse Savannah River Company had economically and promptly deactivated, decontaminated, and disposed of surplus facilities at the Site.³ The Inspector General's report noted that SRS had 162 "surplus facilities" and would possibly add 118 more during the next five years; WSRC decontaminated only one.

Departmental regulations require that surplus facilities be deactivated, decontaminated, and disposed of economically and promptly. However, Westinghouse only disposed of one facility and did not completely deactivate or decontaminate any of the 162 facilities identified as surplus at the Site in FY 1996.³

The cost of this delay to the taxpayers since 1997 has been \$1.3 million per year for additional maintenance and surveillance of these useless facilities. These costs could have been avoided with a single expenditure of \$1.2 million for deactivation of the P-reactor process-water storage tanks, monies which were available to the DOE in unobligated FY 1996 operating funds. Inexplicably, rather than perform the economically beneficial cleanup, the DOE returned these unobligated funds to DOE-HQ in 1997.

Worker Safety Neglected

In a March 2005 letter to Westinghouse Savannah River Company's Closure Business Unit, the Department of Energy Savannah River Operations Office notes that there is a negative safety trend in Site Deactivation and Decommissioning and the Soil and Groundwater Closure Project and that corrective actions have not been effective. The letter cites numerous safety lapses, inadequate control of SGCP subcontractors, and concludes that WSRC and BSRI personnel lack "clear lines of authority, responsibility and communication." In one example, the DOE points to a P-Basin "hazardous energy control incident" warranting immediate management attention.⁴

Conclusion

The record shows that the accelerated remediation and facilities closure process has not reduced risk to the public and that worker safety at the site has been found wanting. Further, there is a pattern of delay which warrants full investigation. The documents attached to this letter provide

ample justification for a SRS Citizens Advisory Board recommendation for a full inquiry and a complete overhaul of the site deactivation and decommissioning program.

Final Note

Madam Chairwoman, over the last four months I have endeavored to point out serious deficiencies in the Department of Energy's environmental management program at SRS. To date, I have received no reply from the CAB or anyone at DOE-SROO or WSRC. The Board's policy of allowing public comment at meetings I believe is well intentioned, but with neither a written record nor follow up, the interested public has no assurance that our concerns are taken seriously. As you know, the mission statement of the CAB states:

“Two important goals of the Board are to improve two-way communication with the SRS impacted communities and to ensure that stakeholders are given an opportunity to become involved in the decision-making processes of DOE, EPA, SCDHEC and SRS management.” [emphasis added]

My final recommendation to you today is that the CAB adopt a formal policy of reciprocal interaction with the public.

Respectfully,

Louis Zeller, Campaign Coordinator

Cc: Chair, Facilities Disposition & Site Remediation Committee

References

1. Memo to DOE Secretary from G. Friedman, IG, Re: SRS D&D Audit, April 14, 2005
 2. *Audit Report, Deactivation and Decommissioning Facilities at the Savannah River Site*, DOE/IG-0684, April 2005
 3. *Audit of the Deactivation, Decontamination, and Disposal of Surplus Facilities at the Savanna River Site*, US DOE, Office of the IG, Audit Report Number: ER-B-98-01, October 23, 1997
 4. Letter to John Devine, WSRC Closure Unit Chief, March 25, 2005, Re: Ferri to Spader letter of 3/21/04 with enclosures
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