

Paducah Citizens Advisory Board

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Recommendation 15-03: DOE Funding Priorities for the FY 2017 Budget

April 15, 2015

Background

The Department of Energy took control of the Paducah Gaseous Diffusion Plant from the United States Enrichment Corporation (USEC) in October of 2014. In the President's FY2016 budget request, \$232 million was proposed to execute planned deactivation activities, as well as meeting ongoing cleanup commitments at the DOE site. This level of funding was \$38 million below the FY2015 enacted level and more than \$90 million below the FY2014 enacted amount.

To continue to meet the planned activities, DOE needs to provide level, consistent funding for FY2017. Recognizing the current budget environment, the CAB believes DOE should provide level funding at the FY 2014 level of \$324 million to meet FY2017 base operations, enforceable commitments, and other planning packages to allow for progression toward demolition activities. Additionally, the current deactivation contract is set to expire in July of 2017, it is vital that we maintain the momentum and safety record established by Paducah's experienced, highly trained workforce that is currently in place at the site.

The CAB was provided the following generic list of categories (in draft form) for the FY2017 Integrated Priorities List (IPL).

- 1. IMMINENT THREATS No activities at Paducah currently are identified in this category.
- 2. BASE OPERATIONS
 - Security
 - Surveillance and Maintenance
 - Utility Operations
 - Deactivation/Stabilization
 - Infrastructure Optimization
 - Waste Operations
 - UF₆ Cylinder Maintenance
 - DUF₆ Conversion Operation and Maintenance
- 3. ENFORCEABLE COMMITMENTS Federal Facility Agreement (FFA)
 - On-site Waste Disposal Facility (if selected)
 - C-400
 - Burial Grounds SWMU 4
 - Burial Grounds SWMUs 5 and 6
- 4. OTHER PRIORITIES/PLANNING PACKAGES
 - Accelerated Deactivation

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- Accelerated Environmental Restoration
- Accelerated Decontamination and Decommissioning

The CAB recognizes DOE's efforts in the shifting of priorities by moving the On-site Waste Disposal Facility up the priority list, moving Burial Grounds – Solid Waste Management Units (SWMUs) 5 and 6 down the list, and making necessary deactivation activities, such as deposit removal, part of the deactivation category.

The CAB recommends that all of the categories listed on the IPL provided be fully funded. Items listed under Base Operations must be fully funded in order for the site to continue operations.

Enforceable commitments should be funded to comply with the Federal Facility Agreement milestones. Continued progress toward environmental remediation milestones remains a top priority of the CAB. Now that operation of the PGDP has ceased and the facilities de-leased, DOE and the regulatory agencies involved with the FFA should explore site-wide remediation strategies. Remediation, decontamination and demolition sequencing should complement adaptive reuse desires of the community.

Deposit removal and accelerated deactivation should be higher priorities due to potential health, safety and environmental concerns. SWMUs 5 and 6 remediation should be moved into the future due to being a lower risk.

While there are no Imminent Threats listed at the Paducah site, the CAB is aware that the items listed under Other Priorities/ Planning Packages are critical to the safety of future workers and the environment. The CAB does not wish to see these additional items ignored to the point where risk level increases. Elimination of these potential risks and safety hazards is the most cost effective long term strategy.

Recommendation

The CAB recommends:

- DOE re-negotiate the milestones related to Burial Grounds SWMUs 5 and 6 to move that down the priority list in favor of Deposit Removal and Accelerated Deactivation.
- DOE fully fund the list of 2017 IPL activities.
- DOE maintain an annual funding that is levelized to equal the FY2014 total in future budget requests, consistent with OMB flat funding requirements. This will allow the site to better meet enforceable milestones, maintain facilities in a safe condition, allow for accelerated deactivation activities, plan appropriately to maintain a skilled workforce and minimize chances of increased contamination threats at the Paducah site.

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•	Ensure that throughout the myriad of contracting scenarios, the current
	deactivation work continue seamlessly at the Paducah site.