



Department of Energy

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MAY 09 2018

Mr. Robert Berry, Chair
Portsmouth EM Site Specific Advisory Board
1862 Shyville Road
Piketon, Ohio 45661

PPPO-03-4861789-18

Dear Mr. Berry:

REVISED RESPONSE TO RECOMMENDATION 15-05: PORTSMOUTH ENVIRONMENTAL MANAGEMENT SITE SPECIFIC ADVISORY BOARD RECOMMENDS MODIFICATION TO WASTE DISPOSITION RECORD OF DECISION

References:

1. Letter from J. Bradburne to R. Berry, "Response to Portsmouth Environmental Management Site Specific Advisory Board Recommendations 15-05, 16-02, and 17-01," (PPPO-03-3181741-17), dated June 29, 2017
2. Letter from W. Henderson, II to J. Bradburne, "Portsmouth (PORTS) Environmental Management (EM) Site Specific Advisory Board (SSAB) Recommendation 15-05," dated September 17, 2015

This correspondence is a revised response to the U.S. Department of Energy (DOE) Office of Environmental Management (EM) Portsmouth Site Specific Advisory Board (PORTS SSAB) Recommendation 15-05. Based on recent efforts by DOE to strengthen regulatory commitments regarding the consolidation of landfills and plumes within Perimeter Road at the Portsmouth site, As DOE has previously stated, the conditions for support that were outlined in SSAB Recommendations 13-02 and 15-05 have been incorporated into the project's lifecycle baseline and the decontamination and decommissioning (D&D) contractor, Fluor-BWXT Portsmouth LLC (FBP), has been given contract direction implementing the shared end state.

Below is a point-by-point reference to DOE's position related to the community conditions for support of on-site waste disposition, as outlined by Portsmouth SSAB Recommendations 13-02 and 15-05, which were passed May 2, 2013, and September 17, 2015, respectively.

The recommendations referenced six conditions:

- No waste from off-site locations.
- The consolidation of landfills within Perimeter Road.
- The consolidation of plumes within Perimeter Road.

- A concerted effort to recover and recycle nickel with the understanding that nickel barrier material was prohibited from on-site disposal.
- The prohibition of any depleted uranium hexafluoride (DUF₆) material in any of its forms into the on-site disposal cell.
- A DOE land use plan on par with the one completed for the Miamisburg Mound facility.

No waste from off-site locations

Wastes from off-site locations are prohibited from disposal in the Portsmouth On-site Waste Disposal Facility (OSWDF).

The consolidation of landfills and plumes within Perimeter Road

Consistent with stakeholder input received during the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) decision-making process, the Portsmouth/Paducah Project Office (PPPO) continues to work collaboratively with Ohio Environmental Protection Agency (Ohio EPA) to establish a regulatory framework to provide the necessary authorizations to allow for the utilization of the landfills and plumes within Perimeter Road as the source of engineered fill for debris placement in the OSWDF.

We are pleased that Ohio EPA has agreed with the path forward, which adds milestones to be included in the Waste Disposition Comprehensive RD/RA Work Plan, the document implementing the requirements of the Waste Disposition Record of Decision (WD ROD). This alteration commits DOE to those consolidations through milestones that are enforceable by Ohio EPA through the WD ROD. The documentation will be finalized upon issuance of the Ohio EPA Director's Order, which provides the DOE commitment and offers DOE the necessary regulatory authorization to excavate the remaining landfills and plumes under the authority of the existing WD ROD.

A concerted effort to recover and recycle nickel with the understanding that nickel barrier material was prohibited from on-site disposal

Although the Waste Acceptance Criteria allows for process gas equipment to be placed into the OSWDF, with the exception of X-326, Portsmouth's project baseline calls for the size reduction and segmentation of converters allowing for nickel recovery until recycling/reuse technologies can be further evaluated.

DOE is moving forward on plans to size reduce the large components and recover the barrier material for the purposes of recycle or off-site shipment. A Material Sizing Area has been established in the X-333 and training has occurred for employees who will perform the barrier extraction and other work associated with the disposition of process gas converters.

The barrier material will be consolidated into Department of Transportation (DOT) compliant containers for interim storage. If a reasonable recycling/reuse technology cannot be identified, this material will be shipped off site for future disposition or disposal. DOE will not dispose of barrier material in the OSWDF.

The prohibition of any DUF₆ material in any of its forms into the on-site disposal cell

As you know, neither the depleted uranium hexafluoride (DUF₆) nor the converted oxide resulting from the DUF₆ conversion operation are within the scope of the WD ROD. These waste streams were not evaluated as part of the waste disposition remedy for the D&D project. Therefore, the disposition of DUF₆ Project material or the DUF₆ treated material, in any of its forms, into the OSWDF is not allowed.

A DOE land use plan on par with the one completed for the Miamisburg Mound facility

The Portsmouth SSAB requested a land use plan to primarily address final site grading and aesthetics of the property once the D&D project was completed and the industrial park was left behind.

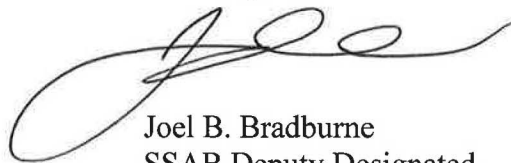
Throughout the course of the D&D project, various reports will be developed that address site grading and other features after remediation and D&D work is executed. These reports in the aggregate will provide the information requested by the Portsmouth SSAB and will clearly indicate DOE's intention to leave the property in a useable state.

Additionally, DOE and Ohio University have worked collaboratively as part of an iterative process to develop a land use map and tools to assist the community in development planning. We have identified and cleared for transfer to the community the first parcel of land for economic development which should be just a few weeks away from becoming a reality. The next parcel has been identified and we are performing the due diligence that ensures the appropriateness for economic development transfer. DOE is willing to be a credible partner to our local communities, remains committed to the cleanup of the Portsmouth site, and supports redevelopment through property transfer. We are demonstrating that redevelopment and the cleanup can co-exist in a mutually beneficial manner.

If you have any questions or need additional information, please contact Greg Simonton at (740) 897-3737.

Thank you.

Sincerely,



Joel B. Bradburne
SSAB Deputy Designated
Federal Official
Portsmouth Site Lead
Portsmouth/Paducah Project Office

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