



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

Monthly Meeting of the Oak Ridge Site Specific Advisory Board

Approved August 12, 2026, Full Board Monthly Meeting Minutes

The Oak Ridge Site Specific Advisory Board (ORSSAB) held its monthly full board meeting virtually via Zoom and in person at 1 Science.gov Way on Wednesday, August 12, 2026, at 6 p.m. Copies of referenced meeting materials are attached. A video of the meeting is available on the board's YouTube, www.youtube.com/user/ORSSAB/videos.

Members Present

Sammantha Ashley
Kris Bartholomew
Laure Clark
Harold Conner, Jr.
Paul Dill
Rosario Gonzalez
Lauren LaLuzerne

Kenneth Lewis
Harriett McCurdy
Otto Merz
Charles Moore
Melanie Rogers
Michael Sharpe
Matt Van Dalen

Members Absent

Brandon Adcock
Mary Butler
Thomas McCormick

Tonya Shannon
Kelli Thompson
Tom Tuck

Liaisons, Deputy Designated Federal Officer, and Alternates Present

Melyssa Noe, ORSSAB Deputy Designated Federal Officer (DDFO), OREM
Roger Petrie, ORSSAB Alternate DDFO, OREM
Kristof Czartoryski, Tennessee Department of Environment and Conservation (TDEC)
Brian Begley, EPA

Others Present

Leah Alexander, OREM
Abby Hill, OREM
Shelley Kimel, ORSSAB Staff

Eileen Marcillo, TDEC
Angel Perkey, TDEC

5 members of the public were present.

Liaison Comments

Mr. Petrie – Mr. Petrie told members there have not been any significant programmatic changes since the last meeting. He said anything new would be covered in the evening's presentation, an overview of the program.

Mr. Czartoryski – None

Mr. Begley – Mr. Begley said he did not have any updates from EPA, but he said he was available to answer questions. He noted EPA's involvement in groundwater and reindustrialization activities at the East Tennessee Technology Park (ETTP). DOE, EPA, and the State of Tennessee continue to coordinate on environmental requirements and land-use restrictions associated with redevelopment.

Presentation

Mr. Bartholomew introduced OREM's Roger Petrie to discuss the evening's topic, an OREM Program Overview.

Mr. Petrie said there would be two presentations for this meeting: an overview of the entire OREM program mission and a separate one about DOE Office of Environmental Management (EM) recommendations about topics for the board to discuss in the coming year.

He opened his presentation by giving background information on EM, its history, and its active cleanup sites nationwide. He said Oak Ridge is one of the largest of EM's 15 cleanup sites. He then gave overviews of the Oak Ridge site's key areas – ETTP, formerly named K-25, Oak Ridge National Laboratory (ORNL), and Y-12 National Security Complex (Y-12) – and their respective roles and histories. Mr. Petrie then discussed OREM's primary objectives:

- Complete cleanup and property transfer activities at ETTP.
- Reduce environmental risks and liabilities at ORNL to support modernization and research missions.
- Reduce environmental risks and liabilities at Y-12 to support its national security mission.
- Maintain sufficient onsite waste-disposal capacity to support cleanup activities.

He said onsite disposal capacity is essential because offsite disposal significantly increases cleanup costs and schedules.

Mr. Petrie then offered more detailed information about each of the Oak Ridge site's key areas.

East Tennessee Technology Park

Major above-ground demolition and soil cleanup at the former K-25 gaseous diffusion complex are substantially complete. Remaining work primarily involves groundwater and infrastructure closure activities.

More than 500 buildings were removed during ETTP cleanup, along with large quantities of contaminated soil and other material. Much of the cleaned property has been transferred for economic redevelopment.

He said there has been significant private-sector investment at ETTP, particularly from companies associated with nuclear technology, advanced fuels, and related energy development.

ORNL

Mr. Petrie discussed ongoing removal of aging Manhattan Project-era facilities from ORNL's central campus. He said current and planned work includes:

- Demolition of former isotope research laboratories and hot-cell facilities.
- Preparation of additional obsolete facilities for demolition.
- Continued disposition of the uranium(U)-233 inventory.
- Continued processing and shipment of transuranic (TRU) waste.

The U-233 disposition project includes recovery of materials useful for producing medical isotopes. He said completion of U-233 disposition could ultimately reduce annual OREM costs at ORNL by approximately \$50 million, allowing those resources to be applied to other cleanup needs.

He also discussed the Transuranic Waste Processing Center (TWPC). He said most contact-handled and remote-handled waste has been processed, with substantial quantities already shipped for disposal. DOE and Tennessee are exploring whether TWPC could become an enduring facility capable of processing limited quantities of waste from other DOE sites, with those sites paying associated processing and operating costs.

Y-12

Mr. Petrie said cleanup at Y-12 continues to focus on removal of aging Alpha and Beta facilities and other legacy structures that occupy valuable space and pose risks to ongoing national security operations. He highlighted:

- Previous demolition of the Biology Complex to support construction of Y-12's lithium processing mission.
- Continued cleanup associated with the Alpha facilities.
- Evaluation of technologies for treating mercury-contaminated soils.
- Preparation of the Beta-1 facility for eventual demolition.

Board and agency representatives said mercury contamination remains a significant issue affecting Y-12 cleanup planning.

Mr. Petrie next presented potential Board topics for the upcoming work year. Proposed subjects included:

1. Onsite waste-disposal capacity and development of the new disposal facility.

2. ORNL and Y-12 cleanup and risk-reduction activities.
3. FY 2028 project and budget development.
4. ETTP groundwater remedies.
5. Transuranic Waste Processing Center operations and future use.
6. Reindustrialization and environmental oversight.
7. Uranium-233 disposition and medical-isotope recovery.

Ms. Noe noted that topics are now subject to headquarters' approval, and not all proposed topics may ultimately appear in the final work plan. She asked members to let staff know if they are especially interested in any particular topic so it can be given higher priority.

Mr. Bartholomew next asked Mr. Begley for EPA input on the work plan.

Mr. Begley said groundwater cleanup is a leading priority. Reindustrialization was also considered important because cleaned federal property is being returned to productive use. He also highlighted U-233 disposition because completion could eliminate approximately \$50 million per year in Oak Ridge costs that could then support other cleanup work.

Mr. Bartholomew then asked Mr. Czartoryski for TDEC input on the work plan.

Mr. Czartoryski said the following topics are important from the State's perspective:

- Y-12 mercury treatment and controls.
- Mercury-contaminated soil remediation.
- ETTP groundwater characterization and remediation.
- Protectiveness and design of future onsite waste disposal.
- TRU waste disposition and continued access to disposal capacity.

Board members asked the following questions:

- Ms. McCurdy asked how the new onsite disposal facility/landfill will be constructed. Will the entire hill have to be excavated, and where will all that dirt go?
 - Mr. Petrie said the facility will be largely above grade, rather than simply being a large, excavated hole. A significant portion of the knoll will be cut down and graded, potentially lowering portions by roughly 30–60 feet. There will be substantial cut-and-fill work, with some excavated material reused in grading the site. He said DOE installed an impermeable liner system over the area to physically simulate conditions after a landfill is constructed. Artificial turf slows runoff, while the liner prevents rainfall from recharging groundwater. Monitoring wells are being used to determine how far groundwater levels decline. Those results influence how deep the disposal facility can safely be constructed.
- Mr. Conner asked how DOE, EPA, TDEC, and other regulators are coordinating environmental requirements and authorizations with all the new companies moving onto former DOE property.
 - Mr. Petrie said this has become a significant issue because development has occurred faster than originally anticipated. The property was generally cleaned to industrial-use standards, not unrestricted-use standards, so land-use controls and deed restrictions

- remain. DOE, EPA, and Tennessee are developing processes defining who reviews company activities, who companies must contact, and how construction is conducted safely.
- Mr. Begley said requirements are handled case by case. Companies may conduct geotechnical borings, install deep structural piers, or excavate below previously remediated depths. Activities within the previously cleaned upper soil zone generally have fewer issues; deeper work requires additional coordination. If contaminated groundwater is encountered, it may have to be captured, sampled, treated, reused under appropriate conditions, or shipped offsite. DOE, EPA, Tennessee, and the redevelopment organization are working collaboratively to prevent problems rather than react to them afterward.
 - Ms. McCurdy asked if the companies locating at ETTP are all U.S.-based, or if some are foreign-owned. Does working with a foreign corporation differ from working with a U.S. corporation?
 - Mr. Petrie said some companies have foreign connections. Mr. Begley said he had not seen a noticeable difference in interactions based on nationality or ownership. He said companies may bring in existing personnel but also hire locally.
 - Ms. McCurdy asked if these companies are competing with one another.
 - Mr. Begley said some likely are, while others may also collaborate where their businesses complement each other—for example, fuel/enrichment companies and advanced-reactor developers.
 - Mr. Conner asked what the current status of the Y-12 mercury treatment facility is.
 - Mr. Petrie said the project remains paused while awaiting headquarters' direction. DOE is working with EPA and TDEC on alternatives that could potentially reuse portions of infrastructure already constructed. He said the project as originally designed is probably not feasible.
 - Mr. Conner asked if money from the mercury treatment facility project can instead be used for technology development to treat mercury-contaminated soil.
 - Mr. Petrie said no, not freely. The mercury treatment project was funded as a congressional line item, and strict rules govern how those appropriated funds can be used. He said DOE is exploring alternatives during the requested extension period. Rather than relying on another very large “megaproject,” DOE is evaluating smaller projects that may be easier to execute and that, collectively, could achieve the necessary mercury-control objectives.
 - Mr. Moore asked if the U-233 Disposition project eventually saves roughly \$50 million annually—or if Oak Ridge receives revenue from processing other sites' waste—whether that money could be redirected to the mercury treatment project.
 - Mr. Petrie said OREM's budget comes through headquarters and that large capital projects/line items have specific congressional funding controls. Those controls restrict both moving money out of a line-item project and moving other funds into it, so it cannot simply be redirected at the site's discretion.
 - Ms. Clark asked if groundwater issues could be presented site by site, showing what's happening at each location and what DOE is legally obligated to do.
 - Mr. Petrie said there is not one document listing the groundwater information for all the sites – ETTP, ORNL, and Y-12. He said there is a regulatory framework governing groundwater cleanup. The default objective is generally restoration to beneficial use, interpreted in this context as meeting drinking-water standards. However, the appropriate

remedy depends on the contaminant, geology, groundwater flow, and other site-specific factors. He then described several possible remedies. Small source areas may sometimes be excavated. Monitored natural attenuation can be used when contaminant levels are near standards and demonstrably declining. More difficult areas may require active treatment. At the ETTP main plant area, DOE plans to test enhanced bioremediation, including injecting materials such as corn oil/corn syrup and bacteria to promote contaminant breakdown. He said Oak Ridge's complex geology makes remedies particularly challenging.

Public Questions

- Mr. Doug Colclasure asked what the latest update is on the Mercury Treatment Facility (MTF). He then said there is a tanker truck that pulls water out of East Fork Poplar Creek every couple weeks and asked what aspect of work that pertains to.
 - Mr. Petrie said the water is used by the Aquatic Ecology Laboratory at ORNL to do research on mercury in the environment, and the researchers use water from the creek to set up an artificial creek in the laboratory to mimic the environment.

Public Comment

- Public Comment #1 – Mr. Luther Gibson gave the following public comment (see attached for written submission):

In your packet, there is input that I provided on the topics, and I'd like to see this be much more of discussion for things instead of being bound by single topics for the month. So following along there, let me come back to the transition of legacy management because there hasn't been a foundation set for that yet, but some of the other things have come up. The next thing I had was budget prioritization input. That would be an FY 29 input because we're doing FY plus two. I have some suggestions on there that we use the Federal Facility Agreement (FFA) milestones for the work planning immediately and January to find topics that might be accelerated if you don't feel that priority is right. So, and then the Site Treatment Plan (STP) also has milestones in it that ought to be looked at when you're prioritizing work and prioritizing which position, and things of that nature. And then the following two things, I'll tell you where you can get copies of the Federal Facility Agreement and the Site Treatment Plan. And I think that they'd be good to look at.

Excess Facilities Risk Reduction activities at ORNL and Y-12 seem to appear on the list. I think it's one of the weaker presentations. Usually it just shows pictures of where the work is. If this is going to be an advisory board, you need to tell us more of the challenges to make recommendations on how to address those. Something that might be good to consider is try to have officials from NNSA and the Office of Science to liaise with the ORSSAB. Jim Donnelly, he was at ORNL, he would meet the SSAB on tours and also when I was chair, I would have lunch periodically with UT-Battelle leadership to tell me what was going on at the lab. That's just a suggestion.

The U-233 Disposition came up, and it looks like it's going to be on there this year again. One of the things about that, the presentation usually gets tied up in societal benefits of what's being done, but they're working with stuff that's almost as dangerous as weapons-grade plutonium and some of the challenges they encounter and how they solve them from a nuclear safety standpoint as well as I thought there was going to be an inventory that would be too difficult to process and have to be disposed of and they've have to stop at some point. So details like that might be more informative in the discussion.

Then we have the Environmental Management Disposal Facility (EMDF). In addition to the reports on the construction progress, I'd like to see more discussion of the waste acceptance criteria, especially the mercury, and then the ambient water quality issues in Bear Creek, you know, that are impacted potentially and how they're being addressed.

Mercury treatment, we talked about that here, trying to figure out what's going on, what's the path forward. You know, I think more needs to come out, and just this is an example: there was a noncompliance for discharges. I think TDEC cited DOE for noncompliance of discharges. Discharge monitoring, that shows the mercury situation's far from under complete control.

Ongoing efforts for waste disposal capacity, I'd like to hear more about the plans – it talks quite a bit about on site, but we don't hear anything about what's going to Nevada, some of the other off-site facilities there.

Groundwater has come up. There's more than ETTP, and one of the things that's always intrigued me is the vapor intrusion thing and what's being done to mitigate that. I was along when the sampling methods were being developed for that, and I really question that's a pathway that's serious enough to be addressed with some of the things they're having to do. And did you know that the record of decision (ROD) for Union Valley, Upper East Fork Creek Characterization Area requires DOE to notify all the well drillers in the area not to drill wells for people on impacted properties. These are the kinds of things that need to be known.

Emergency management, I've talked about that before. I've got a map of the emergency planning zones. There used to be an emergency management forum held annually, this was in 2001. It was a good thing for the community, and it was put on by the Tennessee Emergency Management Agency (TEMA), DOE, ORO, and NNSA – it was a joint effort. Nuclear facilities that are under DOE-ID oversight, I'm still trying to get information on this Standard Nuclear arrangement out in Idaho, and I haven't gotten it from them yet. They're supposed to operate a Category 2 nuclear facility there essentially in the parking lot of the K-25 History Center Wilcox Platform. That's a pretty serious thing to have that kind of material they've got out there in proximity. The emergency planning is something I'd be interested in learning more about, like everyone should be.

And then we have the nuclear facilities under Nuclear Regulatory Commission (NRC) oversight. We've talked about some of these issues here. I think this would be a forum to learn more about what's going on in these facilities, because it is being talked about in terms of soil groundwater management plans, things like that, and TDEC, DOE, and EPA are having to address that. You know, Kairos Power's encountered a lot of contamination, people been doing drilling and things.

There seems to be an issue with the excavation permit program being formalized, and I think that needs to be more known here.

The Public Involvement Plan was talked about this year, and it's on a triannual renewal schedule, but one of the interesting things in DOE's new implementation of the National Environmental Policy Act (NEPA) that I ran into was there was an environmental assessment done for an east end campus development at Y-12, they went straight to a final environmental assessment (EA) and a record of decision on it; there was no public review period or draft. I communicated with headquarters, and they said that's the NEPA procedure now, and that's unfortunate.

Two reports you ought to be familiar with, the Annual Site Environmental Report (ASER) and the Remediation Effectiveness Report (RER). The Stewardship Committee used to call the Remediation Effectiveness Report "The Bible." But if you look at that report, you'll see things that will kind of surprise you. I opened it up the other day, and I saw a technetium plum right outside the K-25 History Center that stuck out at me. So there are things out there that people don't know about, don't think about.

Then we go to Project IKE, Orano, SSP-2. Did you know that the original facility out there was initially posed about out in Idaho about 15 years ago at Eagle Rock Enrichment Facility? They work about a 4,200-acre parcel of land, and it was going to occupy about 400-some-odd acres out there. Look at the buffer; look at the footprint that they're working with there compared to what was proposed out in Idaho by the predecessor or Orano.

Rarity Ridge Wastewater Treatment Facility has a problem with technetium-99 since they got hooked onto the K-25 sewage. This problem still exists, and it was cited in a recent compliance evaluation by TDEC Water Resources. That's something I'm sure DOE would like to see behind them and maybe have a strategy to get there.

Technology development, Harold's interested in that; we all are. We could be a better forum than we are to provide input on technology development. I'm sure from the community standpoint that it's applicable.

Transuranic (TRU) waste, we've talked about that. A lot of problems with the State of New Mexico with their regulation of the Waste Isolation Pilot Plan (WIPP). You know they had a permit opening recently to prioritize shipments, and it's not going well, and we need to be more engaged here than we have on that issue.

Per- and polyfluoroalkyl substances (PFAS), that's somewhat of a new thing over the last few years; something to learn more about. Perma-Fix is actually constructing a PFAS processing treatment facility at ETTP, and they're probably about the most open company that there is about talking about what they do. If anyone's interested, they could maybe give us some information or possibly a tour.

White Oak Creek Embayment is a long-term problem. There was recently an emergency removal action for a sediment retention structure just this is the kind of thing I'd like to have more briefings on, what's going on with that and how serious is it really and just so everybody knows

about it.

Then there's the National Priorities List (NPL). When there was the announcement, half the Oak Ridge Reservation didn't need to be included in the NPL because it was unimpacted by historical operations. It was unclear to me why it wasn't going through a partial completion process. But DOE has proposed a partial completion process for soil at ETTP, but that's been kind of hung up I think on having an understanding of the implementation of land-use controls. And also, TDEC commented on the 2026 Remediation Effectiveness Report that the National Priorities List boundary between this year's report and last year's report. Tell us what's going on there. We're confused.

Okay, the K-1007-P1 Holding Pond. That's a pond out there, it was to be filled in to support the construction of the airport. The Action Memorandum is probably still an action that could be taken, you know, unless that's rescinded or updated.

You could read the legacy management reports and the legacy management issue.

Board Business/Motions

- Ms. Noe gave members an overview of ORSSAB's work planning process and the role of issue groups in the recommendation process. Staff will use Board, DOE, EPA, State, and public input to develop the upcoming work plan. The proposed work plan is expected to return to the Board by October for review and approval. Board members will be asked to volunteer for issue groups associated with work-plan topics. Those groups will develop recommendations as appropriate.
- Members reviewed the budget recommendation approved by the EM & Stewardship Committee, however, the board was unable to take a final action because it no longer had a quorum. Staff will determine whether a properly noticed virtual meeting can be held solely to vote on the recommendation. Otherwise, the action will be carried forward to the October meeting.
- Ms. Noe presented the current slate of candidates for Board officers was presented: Kris Bartholomew for chair, Charles Moore for vice chair, and Kelli Thompson for secretary. Additional nominations may be submitted before or during the October election, provided nominees consent. The Board is scheduled to vote on officers at the October meeting. The EM & Stewardship Committee will also vote on its co-chairs: Laure Clark and Otto Merz. Members elected to leadership positions were reminded that participation in the monthly virtual Executive Committee meeting is expected.

Responses to Recommendations & DDFO Report

Ms. Noe said DOE is still working on the response to the waste management recommendation and should have that completed by the deadline. She said that is currently the only open recommendation.

Committee Reports

Executive – None

EM & Stewardship – Mr. Merz said the committee had completed its review of the budget recommendation and forwarded it to the full Board.

Additions to the Agenda & Open Discussion

Mr. Moore said that the Board should place greater emphasis on groundwater, noting that groundwater cleanup also supports continued reindustrialization.

Mr. Van Dalen said the Mercury Treatment Facility (MTF) is required for other projects to be completed, so that should be a higher priority on the list.

Action Items

None

The meeting adjourned at 7:44 p.m.

I certify that these minutes are an accurate account of the August 12, 2026, meeting of the Oak Ridge Site Specific Advisory Board.



Kris Bartholomew, Chair



Kelli Thompson, Secretary

October 7, 2026

Oak Ridge Site Specific Advisory Board

KB/sbm

August 5, 2026

Mr. Kris Bartholomew, Chair
Oak Ridge Site Specific Advisory Board
P.O. Box 4067, EM-94
Oak Ridge, TN 37831

Dear Mr. Bartholomew:

Fiscal Year 2027 Issues and Input for the Oak Ridge Site Specific Advisory Board

The following input on subjects and issues that should be studied or tracked is offered and intended to be constructive. The topics are in no particular priority order.

East Tennessee Technology Park (ETTP) Transition to Office of Legacy Management (LM)

LM frequently updates its Site Management Guide.¹ According to Update 36 (March 2026), ETTP is scheduled for transition in FY 2037, but previous versions of the Guide have considered earlier transitions. LM says it conducts due diligence by working on sites as much as five years ahead of transition dates. Given the cleanup remaining in Oak Ridge, not to mention additional local DOE presence beyond the foreseeable future, any transition to LM should be tabled permanently. There are already at least four Federal managers in Oak Ridge accountable to no one else locally in addition to activities being directed from the Department of Energy (DOE) Idaho Operations Office.

Budget Prioritization Input

Oak Ridge Environmental Management (OREM) will most certainly request input on FY 2029 (Already!) OREM program budget priorities. The recommendation should reflect more than the effectiveness of OREM's messaging on its priorities. The initial annual engagement from the OREM subject matter expert on planning and execution has been good but diminished by uncertainty about information that can be shared and the delayed release of budget justification details. Ability to track changes in DOE's requests through the Congressional appropriations process is impeded by inability to cross-reference Project Baseline Summary numbers in DOE's request to items in appropriation committee reports. ORSSAB could make better informed priority recommendations if it understood and tracked milestones in the Federal Facility Agreement (FFA) and Site Treatment Plan for Mixed Waste on the U.S. Department of Energy Oak Ridge Reservation.

Federal Facility Agreement

A copy of the entire FFA is maintained by UCOR.² Appendix E (FY 2026-2028 Federal Facility Agreement Milestones) and Appendix J (FY 2028-2047 Non-Enforceable Out-Year Planning Targets) provide information that could be better utilized in work planning and discussions on priorities.

Site Treatment Plan (STP) for Mixed Waste on the U.S. Department of Energy Oak Ridge Reservation

The STP delineates how DOE will treat the site's mixed wastes or develop/modify technologies when necessary to address generated and stored mixed waste at the site. The plan addresses some waste

¹ <https://www.energy.gov/lm/articles/site-management-guide>

² <https://ucor.com/regulatory-agreements-for-the-oak-ridge-reservation/>

streams that have been stored indefinitely and have milestones that have been rescheduled, perhaps most notably for transuranic (TRU) sludge stored in the Melton Valley Storage Tanks. A copy of the STP is maintained by UCOR.³

Excess Facilities Risk Reduction Activities at ORNL & Y-12

Reports on progress should provide more detail on challenges. Delays in nuclear facility D&D resulting from sequencing and coordination of activities with other DOE managers and contractors could be better explained. This has actually been cited to justify budget decreases for nuclear facility D&D in DOE-HQ requests delivered to Congress.⁴ Officials from National Nuclear Security Administration (NNSA) and Office of Science should be more available to liaise with ORSSAB on unclassified activities with environmental implications.

U-233 Disposition

Progress on dispositioning U-233 material should be reported with, in addition to societal benefits of the project, emphasis on operational experience, nuclear facility safety issues that arose and were addressed, inventory of materials too difficult to process, plans for disposition of that material, and anticipated end state of the facilities upon completion of the Isotek contract.

Environmental Management Disposal Facility (EMDF)

In addition to reports on construction progress, issues related to waste acceptance criteria, especially mercury, and ambient water quality issues in Bear Creek Watershed should be presented with more thoroughness.

Mercury Treatment Facility

The pause in construction of this facility has been accepted but cannot be widely and fully understood. More information on the path forward is needed. A noncompliance for discharges is an indicator that the situation is far from under complete control.⁵

Ongoing Efforts to Assure Waste Disposal Capacity

This issue should encompass assurance of waste disposal capacity of all waste streams, not just those directed to on-site disposal facilities.

Groundwater

In 2023, ORSSAB supported DOE's groundwater remedy selections for the ETP Main Plant Area and the K-31/K-33 Area with additional recommendations.⁶ There has been no substantive groundwater discussion at ORRSAB meetings since. New facilities at ETP are required to be constructed with mitigation measures in the design for vapor intrusion due to these underlying contaminated plumes. Comments from TDEC on the 2026 Remediation Effectiveness Report disagree with conclusions presented by DOE for Oak Ridge Reservation groundwater generally regarding overall plume

³ <https://ucor.com/regulatory-agreements-for-the-oak-ridge-reservation/>

⁴ <https://www.energy.gov/documents/doe-fy-2027-volume-5-em>

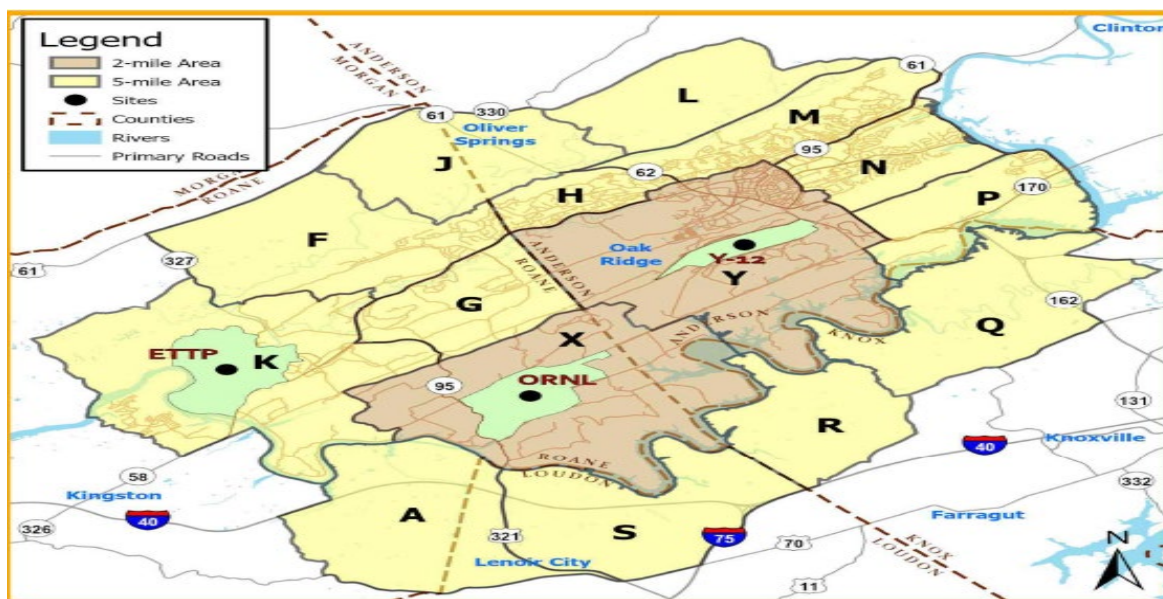
⁵ <https://orrcatn.com/wp-content/uploads/2026/06/06222026-Notice-of-Noncompliance.pdf>

⁶ <https://www.energy.gov/orem/articles/recommendation-255-recommendations-groundwater-remedy-selections-main-plant-and-k-31k>

degradation, attenuation, or groundwater stability.⁷ The Record of Decision for an Interim Action for Union Valley, Upper East Fork Creek Characterization Area requires that DOE notify licensed well drillers in Tennessee annually of the impacted properties and the terms of the license agreements put in place with landowners. The extent of groundwater issues begs for more than just an update on how the selected remedies at ETP are going.

Emergency Management

DOE in Oak Ridge should maintain the highest level of public awareness of what to do in case of an emergency at any of its facilities that would require the public to take protective actions. Several commercially licensed nuclear facilities are planned or under construction within the Emergency Planning Zone (EPZ) of the Oak Ridge Reservation. Depending on their final safety analyses, these new facilities may have their own EPZs beyond their property boundary. There should be more meetings and distribution of materials to inform the public of what to do in case of an emergency. The figure below shows the 2-mile and 5-mile areas that require pre-planned protective actions due to an emergency on the Oak Ridge Reservation from DOE's current operations.



Nuclear Facilities Under DOE-ID Oversight

Standard Nuclear executed an Other Transaction Agreement (OTA) with the DOE-ID to operate its advanced TRISO fuel production capabilities under direct DOE regulatory and safety oversight. Their plan is to leverage the significant environmental reviews, design bases, safety analyses, inspections, and verifications performed under DOE requirements to facilitate an efficient and well-aligned future NRC licensing process.⁸ It has been learned that they are following a set of revised regulations under the OTA contract with the DOE Office of Nuclear Energy – Idaho Operations Office.⁹ The location of these

⁷ <https://orrcatn.com/wp-content/uploads/2026/07/07232026-Remediation-Effectiveness-Report.pdf>

⁸ <https://www.nrc.gov/docs/ML2605/ML26050A011.pdf>

⁹ <https://id.energy.gov/Home/NEDirectives>

facilities with their nuclear and chemical hazards essentially in the parking lot of an historic tourism destination should be concerning.

Nuclear Facilities Under U.S. Nuclear Regulatory Commission (NRC) Oversight

OREM is a cooperating agency with NRC on the preparation of documentation evaluating the environmental impacts of issuing NRC licenses to facilities like Orano Project IKE. Kairos Power has encountered legacy DOE contamination. TDEC has reviewed soil and water management plans to address environmental media encountered during geotechnical and groundwater well drilling activities to assure these activities occur within quitclaim deed restrictions. Oak Ridge Reservation Communities Alliance has engaged in activities regarding these facilities using its grant funds. All of these factors should be considered in placing boundaries on ORSSAB being a forum to learn about these new nuclear facilities.

Public Involvement Plan

A triennial update to the Public Involvement Plan for CERCLA Activities at the U.S. Department of Energy Oak Ridge Site occurred in FY 2025.¹⁰ ORSSAB should have reviewed the draft plan revision to identify areas where it can strengthen its role in facilitating communications with the public. Although the next update is scheduled in FY 2028, ORSSAB should remain cognizant of changes affecting public involvement opportunities in DOE activities generally. Local DOE officials who understand the value of public input should resist eliminating it to accelerate project timelines. Although for an NNSA project, a draft Environmental Assessment review period for public comment was not retained in the new DOE National Environmental Policy Act procedure applied to EA-2310, *East End Campus at the Y-12 National Security Complex; Oak Ridge, Tennessee*, and therefore a public review was not conducted.

Annual Site Environmental Report (ASER)

The ASER is prepared for DOE according to the requirements of DOE Order 231.1B, *Environment, Safety, and Health Reporting*. The ASER includes data on the environmental performance of each of the major contractors and describes significant accomplishments in pollution prevention and sustainability programs that reduce many types of waste and pollutant releases to the environment. DOE has published an annual environmental report with consolidated data on overall performance and status since the mid-1970s. The ASER is a key component of DOE's effort to keep the public informed about environmental conditions. Although OREM is responsible for only a portion of the activity reported, the report provides context for its activities alongside ongoing operations. Office of Science, OREM, local NNSA, and ORSSAB should jointly sponsor a public presentation associated with annual release of the report. The DOE Information Center maintains the historical ASER collection.¹¹

Remediation Effectiveness Report

First issued in 1997, the Remediation Effectiveness Report (RER) has been issued annually to update the performance of completed actions. Because most of the completed remedial actions and environmental media removal actions do not allow unlimited use/unrestricted exposure, these sites require performance monitoring and/or Land Use Controls to protect human health and the environment from physical hazards, residual contamination, and wastes remaining following remediation. Awareness of

¹⁰ <https://www.energy.gov/orem/articles/public-involvement-plan>

¹¹ <https://doeic.science.energy.gov/ASER/>

the contents of this report is essential to anyone who lives in the community or proposes or becomes involved in an activity on any of the sites. The D1 of the 2026 RER is available.¹²

Project IKE, Transfer of Self Sufficiency Parcel-2, and White Wing Scrap Yard

A draft Remedial Investigation Work Plan (RIWP) for White Wing Scrap Yard was issued in 2024, indicating initiation of previously unpublicized planning for the project, which had been deferred except for surveillance and maintenance after above ground removal actions were conducted in the 1990s. That RIWP was rescinded to conduct a Time Critical Removal Action to facilitate transfer of property to Orano to build the Project IKE uranium enrichment facility. The Action Memorandum has taken a long time. Seeming extraordinary actions have been taken to site the facility within known constraints, avoid the nearby subsurface contamination, and resolve uncertainty about eligibility of properties for inclusion in the National Register of Historic Places. Through July 13, NRC accepted comments on the scope of an environmental impact statement to evaluate the environmental impacts of issuing a license to Orano Enrichment USA, LLC (Orano) to construct and operate a gaseous centrifuge uranium enrichment facility on the site. To the extent that OREM is a cooperating agency, it should independently provide and promote public involvement opportunities for this project.

Rarity Ridge Wastewater Treatment Facility

A recent compliance evaluation inspection report by TDEC Division of Water Resources says it all.¹³ “The sludge is wasted into an old clarifier turned storage tank prior to the digester where it sits until the digester is emptied by a truck to be sent for disposal in a low rad facility. After allowing K-25 to connect to the system years ago, there was an influx of radioactive material Technetium 99 (Tc-99) into the system that has been present in the sludge since. Due to the radioactive properties in the sludge, UCOR agreed to take the sludge for disposal at an appropriate location. A letter from the Knoxville Environmental Field Office approved this plan in March 2014. A letter from Leo Sain, UCOR President and Project Manager, stated this arrangement will continue until further notice in March 2014. Due to the warmer temperatures and increased biological activity the concentration of the sludge is going up due to a backlog of waiting for ultimate disposal by UCOR. The facility is also seeing an increase in other parameters that could be a result of this backlog as well. If the concentration is not reduced by the disposal of sludge, the facility could end up violating permit parameters.” DOE’s exit strategy from this problem needs to be better publicized.

Technology Development

Technology development activities are being conducted at the Aquatic Ecology Laboratory as well as by other technology development principal investigators. Even local commercial facilities are working on technologies to support DOE environmental and waste management problems. ORSSAB could provide a better forum than it has to provide input to technology development and ensure it is applicable.

¹² <https://doeic.science.energy.gov/uploads/A.0100.064.3002.pdf>

¹³

https://dataviewers.tdec.tn.gov/dataviewers/apex_util.count_click?p_url=BGWPC.GET_WPC_DOCUMENTS?p_file=1821748105696051192&p_cat=DOCS&p_id=1821748105696051192&p_user=GUEST&p_workspace=19833722515258996

Transuranic Waste

This issue covers the path forward to disposition of TRU sludge stored in the Melton Valley Storage Tanks and more broadly continued assured access to the Waste Isolation Pilot Plan (WIPP) for disposal of Oak Ridge TRU waste. This includes any that could be impacted intentionally or non-intentionally by the definition for legacy TRU and TRU mixed wastes. ORSSAB should skeptically monitor public policy discussions and developments surrounding WIPP, New Mexico state regulation of WIPP, and that state's efforts to prioritize shipments. ORSSAB should not hesitate to issue comments and recommendations even when not specifically requested by DOE. Awareness of the content of the Annual Transuranic Waste Inventory Report as well as reaction to proposed modifications to WIPP's Hazardous Waste Facility Permit is essential.

Per- and Polyfluoroalkyl Substances (PFAS)

OREM should strive to disseminate information on this issue from a local as well as complex wide perspective. There seem to be many aspects to PFAS. These include identification of PFAS, whether stored material is PFAS, PFAS contamination of environmental media, health effects from exposure to PFAS, and implications of PFAS drinking water regulations on remediation goals in current and past cleanup projects. Perma-Fix Environmental is constructing a PFAS process treatment center at ETP. Air permitting application materials provide technical details of their process.¹⁴

White Oak Creek Embayment

An Emergency Removal Action for the Sediment Retention Structure indicates a serious issue that was addressed but not as a permanent solution.¹⁵ White Oak Dam is a retention structure that holds back sediments contaminated with radionuclides, including cesium-137. The cities of Kingston, Spring City, and Rockwood draw drinking water from the Tennessee River system downstream. In the 2005-2006 timeframe, the Agency for Toxic Substances and Disease Registry (ATSDR) published a public health assessment.¹⁶ ATSDR concluded that past, current, and future exposures to radionuclides released from White Oak Creek to the Clinch River/Lower Watts Bar Reservoir are not a public health hazard. People who used or lived along the Clinch River or Lower Watts Bar Reservoir in the past, or who currently do so or will in the future, might have or might yet come in contact with X-10 radionuclides that entered the Clinch River or Lower Watts Bar Reservoir via White Oak Creek. However, ATSDR's evaluation of data and exposure situations for users of these waterways indicates that the levels of radionuclides in the sediment, surface water, and biota are—and have been in the past—too low to cause observable health effects. It was beyond the scope of that report, however, to evaluate a catastrophic release due to dam failure. The schedule and results of periodic inspections may be of interest to the public and ORSSAB.

National Priorities List Significance and Clarification

DOE, EPA, and TDEC recently confirmed that half of the acreage on the Oak Ridge Reservation included in the National Priorities List (NPL) was unimpacted by historic operations and needed no cleanup.¹⁷ Applicability of the partial deletion process prescribed in CERCLA regulations was unclear. DOE has since

¹⁴ https://dataviewers.tdec.tn.gov/dataviewers/f?p=19031:34031:::34031:P34031_SITE_ID:182449

¹⁵ <https://orrcatn.com/wp-content/uploads/2026/01/01212026-Emergency-Removal-Action.pdf>

¹⁶ https://www.atsdr.cdc.gov/HAC/PHA/OakRidge0806-TN/whiteoakcreek/woc_p1.html

¹⁷ <https://www.energy.gov/em/articles/half-oak-ridges-federal-acreage-deemed-suitable-reuse>

petitioned EPA to partially delete Zone 1 soils at the East Tennessee Technology Park on the DOE Oak Ridge Reservation Superfund Site, located in Oak Ridge, Tennessee. That petition is pending a mutual understanding and agreement on implementation of Land Use Controls. Also, TDEC commented on a draft of the 2026 Remediation Effectiveness Report that the Oak Ridge NPL boundary differed significantly from the boundary depicted in the 2025 RER and sought clarification. If the regulators need clarification, the public should too and this can be addressed to or by the ORSSAB.

K-1007-P1 Holding Pond

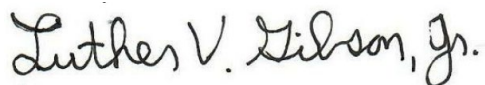
To support construction of the Oak Ridge General Aviation Airport that was proposed to be located within the southeastern section of ETPP, the original remedy of ecological enhancement was identified to be replaced with the pond fill-in alternative in a November 2022 updated action memorandum.¹⁸ That may still be the decision of record that could be implemented with no further notice. Some stakeholders have indicated a preference for the pond to remain as an aesthetic visual resource. The action memorandum may need to be rescinded or updated.

Government Accountability Office (GAO) Reports Critical of DOE Management

In February 2026, GAO said, “NNSA’s Portfolio of Major Projects in the Execution Phase Continues to Face Cost Overruns and Schedule Delays.”¹⁹ In March 2026, GAO said, “DOE Needs to Improve the Accuracy of Cost and Schedule Information for Major Projects and Activities.”²⁰ In May 2026, GAO said, “DOE Shortages in Mission-Critical Positions Have Continued to Increase.”²¹ In July 2026, GAO said, “Changes Needed to Ensure DOE Is Not Prematurely Excluding Less Expensive Options for Large Projects.”²² In July 2026, GAO also said, “DOE Needs to Better Use End State Contracts to Achieve Intended Results.”²³ Also, in July 2026, GAO said, “DOE Is Missing Opportunities to Apply Lessons from Other Countries That Could Reduce Risks and Costs.”²⁴ Such reports should be reviewed for what was found for Oak Ridge projects. The Uranium Processing Facility, Mercury Treatment Facility, and Environmental Management Disposal Facility have been reviewed in these reports.

Thank you for your attention.

Sincerely,
Luther V. Gibson, Jr.



¹⁸ <https://doeic.science.energy.gov/uploads/E.0520.025.0370.pdf>

¹⁹ <https://www.gao.gov/products/gao-26-107777>

²⁰ <https://www.gao.gov/products/gao-26-107820>

²¹ <https://www.gao.gov/products/gao-26-108674>

²² <https://www.gao.gov/products/gao-26-108193>

²³ <https://www.gao.gov/products/gao-26-107745>

²⁴ <https://www.gao.gov/products/gao-26-108082>

About the Author

Luther Gibson served on the ORSSAB and its Executive Committee from 1999-2005. He served as ORSSAB Chair from August 2000 until August 2002, during which 36 recommendations and comments were delivered to agency officials. During his tenure on ORSSAB, he also served on an Environmental Management Advisory Board Alternative Technologies to Incineration Committee. He authored a report that the DOE Assistant Secretary for Environmental Management directed local EM managers to consider in making technology selection decisions. He retired from Consolidated Nuclear Security Y-12 in 2017 after a 40-year career with DOE Oak Ridge prime contractors at Paducah Gaseous Diffusion Plant, K-25, and Y-12. He holds B.S. and M.S. degrees in Chemical Engineering from the University of Kentucky. He worked in the areas of environmental technology development, operations research, environmental compliance, nuclear facility safety, and emergency management technical basis. He is a member of the American Institute of Chemical Engineers and the Air & Waste Management Association. He was recognized in the 1997 International Who's Who of Professionals. He is currently a Vice President of the Coalition of Oak Ridge Retired Employees (CORRE). He chairs CORRE's Planning Committee and its Pension Fund Analysis Committee. He is also a member of CORRE's Other DOE Sites Committee and Contractor Contact Team with Consolidated Nuclear Security (Y-12).



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Land Protection – Remediation Branch
Oak Ridge Office
761 Emory Valley Road, Oak Ridge, Tennessee 37830

August 12, 2026

Mr. Kris Bartholomew
Chair
Oak Ridge Site Specific Advisory Board
Oak Ridge, Tennessee 37831

Dear Mr. Bartholomew

Fiscal Year 2027 Topics for the Oak Ridge Site Specific Advisory Board

The Tennessee Department of Environment and Conservation (TDEC), Division of Land Protection – Remediation Branch, Oak Ridge Office has identified the following topics for which the Oak Ridge Site Specific Advisory Board (ORSSAB) comments and recommendations would be the most beneficial:

1. Outfall 200 Mercury Treatment Facility (OF200 MTF)

The U.S. Department of Energy (DOE) paused the OF200 MTF project at the Y-12 National Security Complex (Y-12) due to cost overruns, delays, and estimated cost for completion. Last year, OREM requested a five-year milestone extension for a Phased Construction Completion Report to mark the end of construction. TDEC understands the project is both over budget and over schedule, and it is estimated as not yet being half completed. Project costs have already exceeded the original estimated project costs from 10 years ago in the Amendment to the Phase 1 Upper East Fork Poplar Creek (UEFPC) Interim Record of Decision (IROD).

As prescribed in the Amendment to the IROD for Phase I Interim Source Control Actions in UEFPC, the completion of the OF200 MTF project is critical for beginning demolition of mercury-contaminated buildings and remediation of soil and principal threat waste beneath the building footprints within the West End Mercury Area (WEMA), in addition to minimizing mercury contamination in UEFPC which continues to exit Y-12 into the City of Oak Ridge and surrounding community.

Demolition activities in the past, such as the 2018 West COLEX project associated with Alpha-4, resulted in a surge of additional mercury being released into UEFPC resulting in a four-month long fish kill.

ORSSAB can play an important role in supporting the FFA parties (EPA, DOE and TDEC) by increasing public awareness of the environmental risks associated with the cleanup at Y-12 National Security Complex and providing input pertaining to DOE budgetary priorities and strategies for minimizing mercury discharges.

2. Y-12 Soil Remediation

The demolition of contaminated buildings allows access to land at Y-12 making it available for construction of new facilities to support National Nuclear Security Administration's (NNSA) missions and modernization efforts. Record of Decision for Phase II Interim Remedial Actions for Contaminated Soils and Scrapyard in Upper East Fork Poplar Creek (DOE/OR/01-2229&D3) requires soil remediation to be implemented as buildings are remediated and contaminated soil becomes "accessible".

The purpose of soil remediation under the IROD is not just for worker protection at a shallow two-foot depth but also to remove soils threatening mercury contamination to groundwater and surface water down to the water table or to bedrock.

The proper sequencing of demolition, soil remediation, and new construction is necessary to ensure that a remediation strategy is implemented at Y-12 that allows beneficial reuse of the property, is protective of human health and the environment, supports the NNSA mission, and saves on overall costs.

ORSSAB can play an important role in supporting the FFA parties and NNSA by increasing public awareness of the complexity associated with the cleanup at Y-12 National Security Complex and providing input and recommendations pertaining to DOE budgetary priorities and innovative strategies that support modernization of the Y-12 National Security Complex while optimizing removal of sources of soil contamination.

3. East Tennessee Technology Park (ETTP)

Many areas of ETTP have been transferred to the public while contaminated groundwater remains to be addressed. Obtaining adequate funding to implement current regulatory groundwater remediation commitments for these now public use areas is critical to ensure continued protectiveness of new users of the property while also characterizing source areas prior to redevelopment activities.

This includes additional groundwater characterization efforts to delineate the extent (lateral and vertical) of contamination and the prevention and/or minimization of further migration of the contaminated groundwater plumes. The interim remedial action objective at ETTP Main Plant Area is to substantially reduce Volatile Organic Compounds (VOCs) contaminant mass in six areas of groundwater contamination. While this interim action concentrates on VOCs and Technetium-99, agencies realize that more work is needed to address remaining groundwater plumes and contaminants like inorganics, metals, Polychlorinated biphenyls (PCBs), and other radionuclides.

ORSSAB can play an important role in supporting the FFA parties by increasing public awareness of covenant deferral requests and ensuing property deed restrictions, providing input pertaining to DOE budgetary priorities, and strategies for investigation and completion of all necessary response actions optimizing industrial park development.

4. Future disposal of waste generated during cleanup of the Oak Ridge Reservation

TDEC continues to work with DOE and the U.S. Environmental Protection Agency (EPA) to establish protective wastewater discharge limits for the Environmental Management Waste Management Facility (EMWMF). The EPA Administrator issued a decision in 2020 to guide this effort. TDEC advocates the implementation of these protections.

TDEC remains committed to ensuring the Environmental Management Disposal Facility (EMDF) is constructed to prevent waste disposed of at the landfill from being released into the surrounding environment. The protectiveness of the EMDF depends on the design and on the long-term stewardship necessary to safely contain mercury and radioactive contaminants that will remain a potential threat to public health and the environment forever.

This includes:

- accelerating EMDF baseline sampling (groundwater and surface water) to allow timely evaluation and reporting before EMDF operation commences;
- designing the EMDF landfill wastewater treatment system including finalizing plans for conveying the existing EMDMF wastewater to the EMDF system to support compliance with discharge limits; and
- evaluating and implementing a robust EMDF monitoring program that provides more conclusive water-level data beneath the landfill and minimizes uncertainties that result from the use of pneumatic piezometers and interpolation of data from wells/piezometers outside the landfill footprint.

EMDF long-term protectiveness also depends on establishing the amount of material such as depleted uranium and mercury that can be disposed of without posing unacceptable risk to public health and environment.

ORSSAB can play an important role in supporting the FFA parties by providing input and sharing with public information pertaining to the landfill. This includes contingencies for final design details based on groundwater studies and resultant determination of the seasonal high-water table.

5. Processing and disposition of Transuranic (TRU) waste

TDEC has approved the FY2026 Annual Update to the Site Treatment Plan that included the path forward to disposition transuranic sludge stored in Melton Valley Storage Tanks. This update includes moving the target date of the preliminary (60%) design for the full-scale sludge processing facility by six years (6) to September 30, 2032.

Though currently stable and safely stored, this waste stream represents one of the highest levels of risk to the public and the environment. The successful design and construction of the sludge treatment facility require a steady fiscal environment.

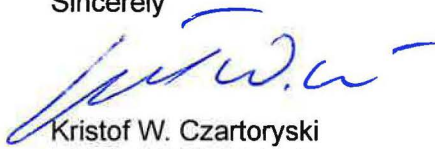
Over the past eighteen (18) years Waste Isolation Pilot Plant (WIPP) has enabled the Oak Ridge Reservation (ORR) site to dispose of 94% of its contact-handled and 80% of its remote-handled TRU debris waste, but the ORR still has a significant inventory requiring permanent disposal. In addition, as one of the few sites with a processing facility capable of managing TRU debris waste, the DOE-ORR is being approached to process TRU waste from other DOE Complex cleanup sites.

The proposed inventory restrictions in the draft permit modification for the WIPP issued by the New Mexico Environment Department (NMED) on April 23, 2026, could hinder timely shipment of waste from the ORR, resulting in long-term storage of this waste at the ORR TRU Waste Processing Center (TWPC).

ORSSAB can play an important role by increasing public awareness of the environmental and budgetary risks associated with the timely processing and disposition of the high-risk waste for which there is potentially a time limited disposal option.

TDEC will be glad to discuss these issues in further detail, and we look forward to the ORSSAB annual planning meeting. If you have any questions, please contact me at (865) 250-9705, or our TDEC-DLP office at (865) 481-0995.

Sincerely



Kristof W. Czartoryski
TDEC ORSSAB Liaison

cc: Erik Olds, DOE
Teresa Robbins, DOE
Melyssa Noe, DOE
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