



## Paducah Citizens Advisory Board

*"working for the future"*

111 Memorial Drive  
Paducah, Kentucky 42001  
(270) 554-3004

### **DRAFT Recommendation 16-XX: DOE Funding Priorities for the FY 2018 Budget, Rev. 4**

Revised March 14, 2016

#### **Background**

The Department of Energy (DOE) took control of the Paducah Gaseous Diffusion Plant (PGDP) in October of 2014 and the site has been transitioned to DOE. In the President's FY2017 budget request, \$272 million was proposed to execute planned deactivation activities, as well as meet ongoing operating and remediation commitments at the PGDP. This funding is nearly \$50 million below the FY2014 enacted budget.

To continue to meet planned activities, DOE needs to provide consistent funding for FY2018 and beyond. Recognizing the current budget environment, the CAB believes DOE should provide funding for the site at the appropriate annual funding level of \$340 million, adjusted for inflation, to meet FY2018 base operations, enforceable commitments, and other priorities and planning packages to allow for progression toward more 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 FY2018 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 – SWMUs 5 and 6
4. **OTHER PRIORITIES/PLANNING PACKAGES**

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- Accelerated Deactivation
- Accelerated Environmental Restoration
- Accelerated Decontamination and Decommissioning

Items listed under Base Operations must be fully funded in order for the site to continue operations. The CAB recommends that all Enforceable Commitments and Other priorities/Planning Packages listed on the 2018 Draft IPL provided be fully funded.

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. Since the site has been transitioned back to the DOE, the opportunity exists for regulatory agencies involved with the FFA to re-evaluate site-wide remediation strategies. For example, SWMUs 5 and 6 remediation should be moved into the future due to being a lower risk than other burial grounds on site.

While we all agree that contamination of the aquifer is of grave concern, DOE would be short-sited in focusing its limited resources solely upon Groundwater remediation. Immediately after discovery of contamination off-site, DOE took actions to mitigate exposure to the public. Therefore, focusing resources primarily on Groundwater remediation at the expense of other activities is unwarranted. Deposit removal and accelerated deactivation should be higher priorities due to potential health, safety and environmental concerns.

It is important for DOE to conduct projects so that there is work in the planning stage (field work, document preparation, agreements), preparation stage, and execution stage. In this way, projects move forward and steady work is provided to the workforce. Additionally, sequencing is necessary so that projects dovetail into one another. For example, assuming a CERCLA cell will be built on-site, an available cell is needed before SWMU 4 is remediated. Dirt from the Soils project can be used as fill dirt. Remediation, decontamination and demolition sequencing should complement adaptive reuse desires of the community.

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.

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**Recommendation**

The CAB recommends:

- **DOE fully fund the Draft List of 2018 IPL activities.**  
**DOE maintain an appropriate annual funding level of \$340 million, adjusted for inflation, in future budget requests. This will allow the site to better meet enforceable milestones, maintain facilities in a safe condition, allow for accelerated deactivation activities, uranium deposit removal, plan appropriately to maintain a skilled workforce and minimize chances of increased contamination threats at the Paducah site.**
- **Ensure that throughout the myriad of contracting scenarios, the current deactivation work continue seamlessly at the Paducah site.**