



## Department of Energy

Portsmouth/Paducah Project Office  
1017 Majestic Drive, Suite 200  
Lexington, Kentucky 40513  
(859) 219-4000

SEP 16 2008

Mr. Allen Burnett, Chair  
Citizens Advisory Board  
111 Memorial Drive  
Paducah, Kentucky 42001

PPPO-02-582-08

Dear Mr. Burnett:

**RESPONSE TO PADUCAH SITE CITIZENS ADVISORY BOARD CONSENSUS RECOMMENDATION 08-02 (LONG TERM STRATEGY FOR DISPOSAL OF RECYCLABLE MATERIAL AT THE PADUCAH GASEOUS DIFFUSION PLANT)**

U.S. Department of Energy (DOE) Portsmouth/Paducah Project Office (PPPO) is in receipt of the Paducah Site Citizens Advisory Board (CAB) Consensus Recommendation 08-02, dated March 26, 2008.

The CAB recommended the following with regard to disposal of nickel and other recyclable metals at the Paducah Gaseous Diffusion Plant (PGDP):

DOE should develop a strategy for disposal of all recyclable metals that will be generated during the decontamination and decommissioning (D&D) of the gaseous diffusion plants (GDP) to maximize reuse/ reclamation. This strategy should include:

- a. Preparation of an overall strategy for disposition of all D&D recyclable metals including final disposition of nickel in process equipment.
- b. Formulation of an incremental release strategy for recyclable metals to avoid unacceptable market upsets.
- c. Development of acceptable release criteria to private sector for radiation levels within all recyclable metals.
- d. Reconsideration of moratorium on conditions for free release of volumetrically contaminated metals.

In response to your recommendation, PPPO agrees that an overall strategy is needed for disposition of potentially recyclable materials during D&D of the GDPs. PPPO's current efforts regarding disposition of potentially recyclable metals generated by site cleanup and facility D&D projects are proceeding in a deliberative manner. Specifically, discussions at the DOE Headquarters level on the need for a documented overall strategy are on-going. At the site level, PPPO will be seeking ways to reduce cleanup costs through re-use and recycling of materials.

Currently, DOE is evaluating the possibility of the sale of volumetrically-contaminated nickel that would allow private industry to use the contaminated nickel in a controlled manner to make high quality products (for example, pure nickel components, stainless steel components, or components made from other alloys). All aspects of the recycling and production would be controlled, and the final products would be controlled for use in radiological applications only. This action would comply with the existing U.S. Nuclear Regulatory Commission (NRC) and DOE regulatory framework, as well as DOE policy (e.g., the Secretary's suspension on unrestricted release for recycling of all scrap metals from radiation areas and the moratorium on unrestricted release of volumetrically-contaminated metals). As progress is made on this initial effort, DOE will evaluate all data and associated information to determine whether the sale of potentially recyclable metals may be appropriate in the future, pending the appropriate NEPA and policy review.

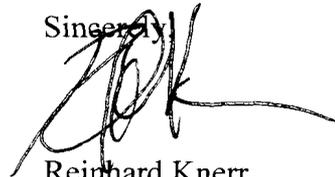
PPPO is evaluating recycling options for non-contaminated material generated from cleanup activities. Most recently PPPO evaluated the potential reuse and recycling of non-contaminated materials from the D&D of C-611-M and C-611-N Sanitary Water Towers and C-342 Ammonia Dissociator Facility. These materials include copper wire from both C-611 and C-342, non-contaminated concrete rubble from C-611 and NH<sub>3</sub> tanks from C-342. Potential re-use options include use of the non-contaminated concrete rubble as base rock on-site and the use of the empty NH<sub>3</sub> tanks at C-746-U Landfill. Additionally, PPPO has directed its contractors to thoroughly evaluate and implement reuse and recycling of non-contaminated materials from non-radiological areas. Paducah Remediation Services, LLC is also coordinating with local companies and the Paducah Area Community Reuse Organization who have expressed interest in recycling non-contaminated material generated from PGDP cleanup activities.

A diverse range of factors affect the feasibility of DOE-wide metals recycling and reuse efforts, and efforts at PGDP must proceed in accordance with DOE policy. Factors to be weighed include regulatory impacts and approvals, stakeholder input, industry concerns including market price and conditions, environmental impacts, and DOE policy. As noted above, the experience gained through the nickel disposition project will be used to inform planning of disposition of other metals.

DOE appreciates the CAB's effort to provide suggestions as we seek ways to reduce cost through innovative approaches to site cleanup and waste minimization. We thank you for your input and for your continued support as we continue our efforts to remediate PGDP.

If you have any questions or require additional information, please contact Rob Seifert at (270) 441-6823.

Sincerely,



Reinhard Knerr  
Paducah Site Lead  
Portsmouth/Paducah Project Office

cc:

DMC/Kevil

EIC/PAD

e-copy:

ballard.turpin@epa.gov, EPA/Atlanta

christine.gelles@em.doe.gov, DOE/EM-12

dewey.crawford@ky.gov, CHFS/Frankfort

edward.winner@ky.gov, KDEP/Frankfort

ericpgdpcab@bellsouth.net, EHI/PAD

gene.chou@em.doe.gov, DOE/EM-12

janet.miller@lex.doe.gov, PRC/PAD

jonathan.kang@em.doe.gov, DOE/EM-32

kimpgdpcab@bellsouth.net, EHI/PAD

rachel.blumenfeld@lex.doe.gov, PPPO/LEX

rob.seifert@lex.doe.gov, PPPO/PAD

russell.boyd@prs-llc.nct, PRS/Kevil

yvette.cantrell@rsienv.com, RSI/ORD