



Department of Energy

Portsmouth/Paducah Project Office
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Lexington, Kentucky 40513
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JUN 29 2010

Ms. Judy Clayton, Chair
Paducah Citizens Advisory Board
111 Memorial Drive
Paducah KY 42001

PPPO-02-497-10

Dear Ms. Clayton:

RESPONSE TO CITIZENS ADVISORY BOARD CONSENSUS RECOMMENDATION 10-03 RECOMMENDATION FOR THE U.S. DEPARTMENT OF ENERGY'S CONTINGENCY PLAN FOR A POTENTIAL WASTE CELL BREACH

The U.S. Department of Energy (DOE) is in receipt of Citizens Advisory Board (CAB) Consensus Recommendation 10-03 dated March 18, 2010 related to the Waste Disposal Evaluation Feasibility Study. Recommendation 10-03 appears in bold below.

The Paducah Gaseous Diffusion Plant (PGDP) CAB recommends that, as part of the evaluation of waste disposal options at the PGDP, DOE communicate to the public potential consequences of a containment failure. This would establish bounds on the consequences of containment failure and put the risk to the public health and safety and the environment into perspective.

It is anticipated that the DOE response will include:

- **A description of possible failure modes,**
- **how radioactive and/ or hazardous materials could be released and how quickly,**
- **a plan for repairing identified damages, and**
- **DOE's plans to minimize the consequences of a failure.**

DOE is evaluating a site wide disposal strategy to deal with cleanup waste. Both on-site and off-site disposal alternatives are being considered for this waste. The off-site disposal alternative involves shipping the waste off-site to disposal facilities licensed to accept these wastes. The on-site alternative involves the construction of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) disposal facility on DOE owned property.

DOE understands the concern represented by the CAB's recommendation. DOE will be using the CERCLA/Federal Facility Agreement (FFA) process to analyze these waste disposal alternatives. Through this process, the potential short-term and long-term effectiveness of each alternative, among other factors, will be evaluated. The CERCLA/FFA process requires in-depth involvement by the regulators, input from the public, and regulatory approval of multiple documents.

A key document that is being developed under the CERCLA/FFA process is the Remedial Investigation/Feasibility Study (RI/FS) Report. It will evaluate various risk scenarios associated with the on-site and off-site alternatives. For the on-site alternative, the RI/FS will include consideration of seismic risks and the potential impacts of a release to groundwater. For the off-site alternative, the RI/FS Report will include consideration of the risks associated with transportation of waste to a disposal facility and also will examine the risk of an off-site facility not being available.

Additionally DOE will host a public meeting where potential failure modes and engineered barriers and mitigation structures are communicated to the public.

Should the on-site alternative be selected, a surveillance and maintenance plan will also be developed that would detail DOE's responsibilities for maintenance of the disposal facility.

DOE appreciates your continued efforts to provide recommendations that improve the effectiveness of its environmental management mission in Paducah. If you have any questions or require additional information, please contact Buz Smith at (270) 441 -6821.

Sincerely,



Reinhard Knerr
Paducah Site Lead
Portsmouth/Paducah Project Office

cc:
DMC/Kevil

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