ECONOMIC DEVELOPMENT PARTNERSHIP
Serving Aiken & Edgefield Counties

Fred E. Humes
Director

April 23, 2001

John T. Conway, Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue NW, Suite 700
Washington, DC 20004-2601

Subject: Recommendation 2001-1, High Level Waste Management at the Savannah River Site

Dear Chairman Conway:

The Economic Development Partnership has, for the past several years, commented on matters affecting the safe operation and long-term viability of the Department of Energy's Savannah River Site (SRS). Our interests include (1) using SRS capabilities to support new defense and energy programs and (2) advocating the expeditious stabilization, storage, disposition or cleanup of wastes and environmental damage resulting from cold-war production activities.

Your subject recommendation is concerned with the most significant waste stabilization and disposition activity at SRS. We concur with the generally held view that the approximately 34 million gallons of high level liquid waste stored in underground tanks represent the greatest potential for risk to the offsite population and damage to the environment. Because these wastes are contained in aging tanks (some approaching 50 years) and because the tanks are near or in the water table, we have long advocated the expeditious removal of wastes from the tanks and placement into the significantly more stable vitrified form. It is in this context that we offer comments on the four actions contained in your recommendation.

We appreciate and support your call for DOE diligence in addressing the worsening condition of the SRS tank farms and your specific recommendation to accelerate the schedule for operation of a salt processing facility. We further believe that additional funding and management attention must be directed to the total integrated high level waste system if tanks are to emptied at the earliest possible date.

We are concerned and do not agree with other portions of your recommendations that could serve to slow down current programs to remove and vitrify sludge wastes. SRS currently has the ability to vitrify sludge wastes in DWPF. Sludge wastes represent about ten percent of the waste volume, but constitute over 50 percent of the radioactive hazard as measured in curies. **We believe that the fastest and surest way to reduce public**

Post Office Box 1708 ■ Aiken, SC 29802 ■ 171 University Parkway ■ USCA
(803) 648-3362 ■ FAX (803) 641-3369 ■ edpsc@aol.com ■ http://www.edpsc.org

health risks and environmental hazards at SRS is to place sludge wastes in the safe vitrified form at the earliest possible time.

- We specifically do not concur with recommendation No. 4 that would decrease contractor incentives for near-term DWPF production. On the contrary, we believe that the incentive structure should be revised to assure that the DWPF facility runs at capacity.

- Recommendations to restrict use of tanks (Recommendation No. 1 - Tank 6, and possibly Recommendation No. 3 in restoring operating margin) will also serve to reduce the removal of sludge wastes from tanks for vitrification. Your report notes that tank farm space must be carefully managed in order to support removal of sludge wastes from tanks and for DWPF sludge-only processing. Any reduction in tank farm working volume will impact DWPF operations pending operation of the new the salt processing facility. We believe that using tank 6 (and other similar tanks) for recycle water is an acceptable risk tradeoff for achieving the removal and vitrification of high activity sludge wastes.

- While your recommendation specifically addresses tank 6, it could also be implied to recommend that the liquid levels be reduced to below known leak sites in all SRS tanks. This action would have a serious impact on SRS tank farm operations.

We appreciate the past diligence of your Board in addressing the expeditious and safe stabilization, storage and disposal of defense materials at SRS. Thank you for the opportunity to comment on this important recommendation.

Sincerely,

Fred E. Humes

cc: Dr. Carolyn L. Huntoon, Acting Assistant Secretary for Environmental Management
Mr. Greg Rudy, Manager, Savannah River Operations Office