Department of Economic and Community Development
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Alex Fischer
Commissioner

Don Sundquist
Governor

January 25, 2001

Mr. Gary S. Hartman
U.S. Department of Energy
Oak Ridge Operations Office
Post Office Box 2001
Oak Ridge, TN 37831

Dear Mr. Hartman:

The Department of Economic and Community Development appreciates the opportunity to comment on the important issue of the future mission of the Oak Ridge Y-12 Plant. Pursuant to our review of the Draft Site-Wide Environmental Impact Statement (SWEIS), we strongly support modernization of Y-12 as the preferred alternative (presented as alternative 4 in the SWEIS).

For more than 50 years, the Y-12 facility has been essential to economic development in Oak Ridge and, indeed, the entire state of Tennessee. The thousands of jobs created and provided by Y-12 and the associated economic development and job creation by contractors of the facility have been anchors of the region's economy. In fact, today the facility employs over 4,000 people and has an estimated $420 million annual economic impact to Tennessee. Modernization guarantees that Y-12 remains an economic engine of growth for the region well into the future.

Modernization also guarantees the continuation of technology assistance and transfer that has helped thousands of private-sector companies become more efficient, more profitable and, subsequently, larger employers. Through the Centers for Manufacturing Technology and the National Prototype Center, Y-12 has supported industry, seeking to produce one-of-a-kind products, solve tough manufacturing problems and modernize industrial processes and systems. Modernization will lead to the protection of workers, the public and the environment, and at the same time, provide outside industry with innovative standards, technologies and engineering systems.

Modernization's economic impact also includes the retraining or modernization of the Y-12 workforce. Just as capital will be invested in the maintenance and upgrade of the Y-12 facility, so too will capital be invested in upgrading the skills of Y-12's employees. This investment in the facility's employees will play a major role in the long-term viability of the regional economy and the earning potential of the Y-12 workforce.

The State of Tennessee enjoys a long-held partnership with Y-12 and the economic development benefits of the facility. It is in this spirit that we look forward to the many economic development advantages that lie ahead through the modernization of Y-12 and the subsequent creation of a world-class Y-12 workforce.

Thank you for the consideration of these comments.

Cordially,

Alex Fischer

AF:TG:mm

Comment No. 22 (cont.) **Issue Code: 12**

LLW and unified LLW treatment and disposal was issued in February 2000 (65 FR 10061, February 25, 2000) which is consistent with the preferred alternatives outlined in the Waste Management PEIS ROD. As a result of this ROD, the current disposal options for LLW and mixed LLW at Y-12 will not change.

Comment No. 23 **Issue Code: 11**

DOE has initiated consultation with the State Historic Preservation Officer (SHPO) (see letter dated October 29, 1999 in Appendix C). Volume I, Section 5.10 describes the anticipated impacts from the proposed action and alternatives for construction and operation of the proposed facilities for the HEU Storage Mission and the Special Materials Mission in the Y-12 SWEIS. DOE expects no impacts to cultural and historic resources from the construction of the HEU Materials Facility at Site A or B and the Special Materials Complex at Sites 1, 2, or 3. Potential impacts are expected with the proposed Upgrade Expansion of Building 9215 which could include major alteration of historic property. Procedures for addressing the unanticipated discovery of cultural resources are described in the Y-12 Cultural Resource Management Plan. DOE will consult with the SHPO in accordance with the Y-12 Cultural Resource Management Plan and is committed to complying with provisions in this plan and/or the programmatic assessment to evaluate, address, and mitigate any adverse effects that may result.

28/22

28/22 (cont.)

28/22 (cont.)

Comment No. 24 **Issue Code: 04**

Figure 4.4.2-3 shows the geology and identified karst features of ORR. The Y-12 National Security Complex is sandwiched between the Rome Formation and the Knox Group. Section 4.4.2 describes the Knox Group as having karst features including large fractures, cavities, and conduits that are typically found at depths greater than 33 m (100 ft). Since the primary geologic features influencing Y-12 include dissolution and karst features, DOE would conduct appropriate geotechnical studies prior to finalizing the design and location of new construction foundations. Stormwater from construction would be

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January 29, 2001

U.S. Dept of Energy
Oak Ridge Operations Office
NEPA Compliance Section
P.O. Box 2001
Oak Ridge, TN 37831-8722

re: DRAFT - Site-wide Environmental Impact Statement (EIS)
for the Oak Ridge Y-12 Plant
DOE/EIS-O309

The Tennessee Wildlife Resources Agency (TWRA) has reviewed the above referenced document and provides the following recommendations:

Should the U.S. Department of Energy (DOE) proceed with Alterative 4: No Action - Planning Basis Operation; plus, Construct and Operate a New Highly Enriched Uranium (HEU) Materials Facility and a New Special Materials Complex (SMC), TWRA recommends the HEU materials facility be constructed at Site B or the upgraded expansion of building 9215; the SMC facility should be constructed at either Site 2 or Site 3. Utilization of these previously disturbed and industrialized sites should have minimal impact on wildlife resources and their habitat. 29/01

If you have questions or need information please contract me at 615/781-6643.

Sincerely,

Aubrey D. McKinney, Chief
Environmental Services Division

ADM/bjs

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Comment No. 24 (cont.) **Issue Code: 04**
controlled and there would be no direct discharges to known sinkholes or other karst features that would impact geologic stability or groundwater resources.

Comment No. 25 **Issue Code: 05**
The information requested by the commentor has been directed to the appropriate TDEC-Oversight-OR personnel staff for disposition. Including this information in the SWEIS would not be appropriate or improve the document.

Comment No. 26 **Issue Code: 05**
A description of liquid treatment facilities at Y-12 can be found in Volume II, Appendix A.5.2 of the SWEIS. DOE's Office of Environmental Management oversees and manages the ORR, including Y-12, remedial activities. There are several environmental restoration projects in the Y-12 Site area of analysis which are referred to in various sections within Chapter 4, and Section 4.5 in particular. These include the Bear Creek and Upper East Fork Poplar Creek Watershed projects which have been merged and is now called the Y-12 Project. Questions regarding specific processes used in CERCLA restoration projects should be directed to the ORO and EM personnel at Oak Ridge.

Comment No. 27 **Issue Code: 05**
There are several environmental restoration projects within the Y-12 Site area of analysis which are referred to in various sections of Chapter 4, and in Section 4.5 in particular. These include the Bear Creek and Upper East Fork Poplar Creek Watershed projects which have been merged and are now called the Y-12 Project. The project addresses both on-site and off-site releases to groundwater. Groundwater contamination has left the eastern part of Y-12 and is being actively remediated. Questions regarding specific processes and procedures used in CERCLA restoration projects should be directed to the ORO and EM personnel at Oak Ridge.

Comment No. 28 **Issue Code: 22**
Comment noted.

Comment No. 29 **Issue Code: 01**
Comment noted. Volume I, Sections 3.2.3.2 and 3.2.4.2 describe the proposed sites for the construction of the HEU Materials Facility and the Special Materials Complex, respectively. DOE's preferred site for the HEU Materials Facility is Site A which is a previously disturbed area and currently the location of the Y-12 West Portal Parking Lot. The preferred site for the Special Materials Complex is Site 1, described in the Final SWEIS. The ROD on the Y-12 SWEIS will identify DOE's decision and action on the proposed action and siting of facilities.