

State of Tennessee  
Nashville, TN  
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STATE OF TENNESSEE

DON SUNDQUIST  
GOVERNOR

February 14, 2001

Mr. Gary S. Hartman  
Y-12 SWEIS NEPA Document Manager  
Department of Energy  
Oak Ridge Operations Office  
P.O. Box 2001  
Oak Ridge, Tennessee 37831

**RE: State of Tennessee's Comments on the United States Department of Energy Draft Site-Wide Environmental Impact Statement For The Oak Ridge Y-12 Plant.**

Dear Mr. Hartman:

On behalf of the Governor of the State of Tennessee and as the lead point of contact for state NEPA reviews, I am submitting the **State of Tennessee's Comments on the United States Department of Energy Draft Site-Wide Environmental Impact Statement for the Oak Ridge Y-12 Plant**. Also enclosed are comments from specific state agencies. Please consider these comments as you would those in this letter.

The State of Tennessee firmly supports the defense programs and mission of Y-12. The State submits that the comprehensive modernization of the Y-12 Plant including the construction and operation of the Highly Enriched Uranium Materials Storage Facility and the Special Materials Complex as described in Alternative 4 of the Draft Statement is clearly the superior alternative. Furthermore, the replacement of numerous aging facilities with a state of the art facility will have enormous economic and environmental benefits as well as provide significant opportunity for scientific inquiry.

The State pledges its full support and cooperation to ensure that modernization activities and associated environmental remediation are coordinated, continuous and expeditious.

State Capitol, Nashville, Tennessee 37243-0001  
Telephone No. (615) 741-2001

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**Comment No. 1**  
Comment noted.

**Issue Code: 22**

We appreciate the opportunity to comment and will respond to additional opportunities in the future. If you have any questions, please contact Mr. Dodd Galbreath at (615) 532-8545.

Sincerely,



Justin P. Wilson  
Deputy to the Governor for Policy

Encl.

The following state agencies commented on the draft SWEIS:

Department of Environment and Conservation:

- DOE Oversight Division
- Division of Radiological Health
- Tennessee Historical Commission
- Division of Water Supply

Department of Economic and Community Development  
Tennessee Wildlife Resources Agency

State of Tennessee  
Nashville, TN  
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STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DOE OVERSIGHT DIVISION  
761 EMORY VALLEY ROAD  
OAK RIDGE, TENNESSEE 37830-7072

February 14, 2001

Mr. Gary Hartman  
US Department of Energy  
Oak Ridge Operations, EM-912  
PO Box 2001  
Oak Ridge, TN 37831

Dear Mr. Hartman

**Document NEPA Review: Draft Site-Wide Environmental Impact Statement for the Oak Ridge Y-12 Plant**

The Tennessee Department of Environment and Conservation, DOE Oversight Division (TDEC/DOE-O) has reviewed the subject document in accordance with the requirements of the National Environmental Policy Act (NEPA) and associated regulations of 40 CFR 1500-1508 and 10 CFR 1021 as implemented.

**General Comments**

The TDEC/DOE-O concurs with DOE that option 4 is the preferred option. This option provides for the Decontamination and Decommissioning (D&D) of certain facilities to make way for the Highly Enriched Uranium (HEU) Materials Facility and the Special Materials Complex. The construction of a new state of the art facility to accomplish each of these respective functions will allow for the replacement of numerous aging facilities that currently fulfill these two functions. New facilities will provide greater accountability of control of materials, consolidation of materials, better environmental controls over potential releases and better protection from the phasing-out of the existing HEU storage and special material operations. These facilities will provide adequate waste management capacities to support expected generation of waste volumes. Presumably, the facilities will increase greater reliability of safety in catastrophic events such as earthquakes.

The decontamination and decommissioning of old facilities on the Y-12 site should be integrated into this document and made an integral part of the budget for the modernization effort at the Y-12 plant.

**Comment No. 2**

**Issue Code: 12**

Potential D&D activities do not necessarily relate one to one with vacated facilities resulting from the proposed action and alternatives in the SWEIS. Only those facilities declared surplus to DP mission needs will be considered and evaluated for potential transfer to EM and D&D. In addition, D&D activities at Y-12 do not depend exclusively on the proposed action and alternatives in the Y-12 SWEIS, and are already occurring or planned as a result of site downsizing activities. Buildings that become surplus as a result of downsizing or modernization will go through the Y-12 Facility Transition Program, as outlined in A.1.2, prior to transfer to EM. Transfer to EM will be done as prescribed by DOE O 430.1A, *Life Cycle Asset Management*. A facility's budget for S&M is transferred to EM upon transition of the facility. At this time, surplus facilities have not been identified due to proposed modernization activities analyzed in the SWEIS.

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(cont.)

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