The characterization of all options as "No Action" makes this document unclear and possibly misleading. While it is true that all these options constitute a continuation of activities on site, the construction of new buildings and/or the significant renovation of old buildings is a significant activity and should be characterized as such.

18/19

Specific Comments:

On page S-4 first paragraph: In the discussion of the current practice of down-blending High Enriched Uranium (HEU), several examples are given including blending HEU with Depleted Uranium (DU). In the description of future campaigns, the possibility of using DU is no longer included. With all of the excess DU DOE need to dispose of it would appear to be appropriate for future down-blending campaigns to include blending HEU with DU.

19/26

On page S-9 fourth paragraph: In the discussion of environmental restoration it is mentioned that the Oak Ridge Operations Office is coordinating with regulators, through the Federal Facilities Act (FFA), Tennessee Department of Environment and Conservation (TDEC) and the Environmental Protection Agency (EPA). This is a misleading description of the authority imparted by the FFA and of the regulatory relationship between DOE and TDEC. The FFA provides for oversight of the DOE by TDEC but not regulatory authority. Caese where TDEC has regulatory authority over DOE come from other legal statutes. It is important to be clear that the DOE claims exemption from any outside regulation of radiation issues under the Atomic Energy Act (with the one exception granted by the NESHAP regulations). Since the cleanup of the Y-12 site includes the cleanup of radioactive contamination neither TDEC nor EPA has regulatory authority for this aspect of ORR activities.

20/25

On pages S-18 and S-18: The discussion of emissions addresses only the process emissions relating future emissions estimates to previously measured emissions. For completeness non-process emissions also need to be addressed. This is especially critical as cleanup activities increase, thus increasing the possibility of significant emissions from these non-process activities.

21/07

On page S-37 fifth paragraph: It is mentioned that disposal of radioactive wastes is restricted by the lack of appropriate waste sites. This should be a major concern for all of the Oak Ridge sites. Major effort needs to be put into resolving this issue as quickly as possible. In the best possible scenario, this issue would be addressed before an increase in the generation of new wastes is allowed.

22/12

Comment No. 13 **Issue Code: 05**

The gross alpha and beta activity in groundwater at Y-12 is shown in Figures 4.5.2-2 and 4.5.2-3 in the Final SWEIS. These figures are taken from the ORR Annual Site Environmental Report for 1999. As shown in the figures, the Chestnut Ridge Hydrogeologic Regime monitoring shows no gross alpha or beta contamination above the maximum contaminant level (MCL) of <15 pCi/L and MCL < 50 pCi/L, respectively.

Comment No. 14 **Issue Code: 06**

The Biological Monitoring and Abatement Program is a successful program at Y-12. The flow augmentation to the East Fork Poplar Creek and the continuing mercury reduction remediation efforts at Y-12 have reduced toxicant exposure to aquatic organisms when compared to historic levels of exposure. DOE agrees that continued remediation is required to achieve a status of supporting state-designated uses. Section 4.6.1 has been revised to note this issue.

Comment No. 15 **Issue Code: 25**

Comment noted. The proposed HEU Materials Facility is a storage facility with no production-related emission sources. The exhaust emissions for the ventilation system would comply with applicable Federal and state requirements (see Section 3.2.3.2 of the SWEIS). Appropriate pollution prevention and waste minimization measures would be included in the final design of potential new facilities.

Comment No. 16 **Issue Code: 14**

Comment noted. A description of the safety features of the proposed facilities can be found in Sections 3.2.3.2 and 3.2.4.2. One of the major design goals for the proposed facilities is to achieve a reduced risk to workers and the public relative to the existing storage and production facilities. The design of the proposed HEU Materials Facility and the Special Materials Complex would meet Y-12 Conduct of Operations and Integrated Safety Management requirements. The processing area within the HEU Materials Facility and all the production areas within the Special Materials Complex facilities would be equipped with

TENNESSEE HISTORICAL COMMISSION
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
2941 LEBANON ROAD
NASHVILLE, TN 37243-0442
(615) 532-1550

January 31, 2001

Mr. Ray T. Moore
USDOE/Oak Ridge Operations
Post Office Box 2001
Oak Ridge, Tennessee 37831-8739

RE: DOE, Y-12/SITE WIDE EIS, OAK RIDGE, ANDERSON COUNTY

Dear Mr. Moore:

Pursuant to your request, this office has reviewed documentation concerning the above-referenced undertaking received Tuesday, January 30, 2001. This is a requirement of Section 106 of the National Historic Preservation Act for compliance by the participating federal agency or applicant for federal assistance. Procedures for implementing Section 106 of the Act are codified at 36 CFR 800 (64 FR 27044, May 18, 1999).

Considering available information, we find that the HEU Materials Facility and Special Materials Complex projects as currently proposed will NOT AFFECT ANY HISTORIC PROPERTIES ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES. Among the other projects anticipated under the above-referenced document, there are some that MAY ADVERSELY AFFECT PROPERTIES THAT ARE ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES. You should now begin consultation with our office as funds for these projects become encumbered. Please direct questions and comments to Joe Garrison (615) 532-1559. We appreciate your cooperation.

Sincerely,

Herbert L. Harper
Executive Director and
Deputy State Historic
Preservation Officer

HLH/jyg

Comment No. 16 (cont.) **Issue Code: 14**
gloveboxes, inert atmosphere, negative air pressure, and other engineered controls supported by administrative controls to protect workers from exposure to radiological and hazardous materials and prevent contamination of uncontaminated areas. As explained in Section 3.2.4.2, there are no radiological materials handled within the proposed Special Materials Complex facilities.

Comment No. 17 **Issue Code: 16**
Waste management activities at Y-12 are discussed in Volume I, Section 3.2.2.2 and in Volume II, Section A.5. Cumulative impacts from waste management activities are discussed in Volume I, Section 6.4.7. EM Program activities are managed separate from DP waste management activities at Y-12. EM waste activities are currently ongoing and would continue regardless of future projects proposed for Y-12 DP missions. Funding for EM waste management activities is separate from funding for DP waste management activities and will not be affected by DP construction activities.

Comment No. 18 **Issue Code: 19**
23/11 Use of No Action in each alternative reflects the continuation of current DP missions at Y-12 (i.e., No Action - Planning Basis Operations Alternative), in addition to the potential new facilities for the HEU Storage Mission and the Special Materials Mission. DOE believes including No Action - Planning Basis Operations Alternative in each alternative helps the public understand the total operation impacts of the Y-12 National Security Complex. The operation impacts of new facilities are very small when compared to Y-12 overall operations.

Comment No. 19 **Issue Code: 26**
The Final SWEIS has been changed to reflect that depleted uranium is not used as a blendstock at Y-12. However, low enriched and natural or depleted uranium blendstock is stored at Y-12.

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER SUPPLY
GROUND WATER MANAGEMENT SECTION
9th Floor, 401 Church Street
Nashville, Tennessee 37243-1549

FROM	DATE
SOS	02/02/2001
TO	
TAM	02/2/01
WOD	2/2

MEMORANDUM

TO: David Harbin through David Draughon 400

FROM: Scotty Sorrells, DWS - Ground Water Management Section SOS

DATE: February 2,2001

SUBJECT: Draft Site-Wide Environmental Impact Statement for the Oak Ridge Y-12 Plant

Thank you for the opportunity to review and comment on the "." A member of my staff has reviewed this document and has provided me with the following comments.

1. Please note in the geologic assessment of the site that the area is in a karst region and due caution should be used in any construction activity. Sinkholes are generally the surface depression of vertical conduits through soluble carbonate rocks. The conduits function as pathways for surface water drainage to underground water reservoirs in the bedrock. These reservoirs commonly exist in an extensive, interconnected network of underground passages and form the source for many private drinking water wells in rural areas of Tennessee. Any work in and around a sinkhole could readily contaminate ground water and drinking water supplies. A karst area by nature is an unstable geologic area, which has no permanent means of stabilization and is subject to times of movement and settling. This uncontrollable movement may cause some damage to any permanent structure placed on or around the karst feature. 24/04

   We would ask that DOE acknowledge all storm water discharges to the subsurface through any sinkhole on site.

   We would also ask that extensive geologic review be done of any area before construction is to take place.

2. We also would like to see a complete inventory of all existing floor drains, in each building and where those drains lead. 25/05

3. Location of all existing subsurface fluid disposal systems (i.e. septic systems).

4. Location of any and all "dry wells"

5. Location of any and all other fluid disposal systems both historic and current in the area and process for ground water remediation. 26/05

6. We are aware that groundwater pollution has left the Reservation. What procedures are to be in place to remediate these areas. 27/05

Comment No. 20 **Issue Code: 25**

Comment noted. The SWEIS Summary, page S-9, fourth paragraph (environmental restoration) and other appropriate sections have been revised to indicate neither TDEC nor EPA has regulatory authority with regard to the management of radioactive materials and waste at ORR. DOE claims exemptions from any outside regulation of radiation issues under the *Atomic Energy Act* with the exception granted by the NESHAP regulation. DOE is the lead agency of a tri-party FFA that includes making clean-up decisions on the ORR. EPA and TDEC are also parties to this agreement.

Comment No. 21 **Issue Code: 07**

Non-process radiological emissions from other Y-12 activities and EM clean-up work would be very minor in comparison to Y-12 production process emissions. Airborne radionuclide monitoring is conducted at ORR and includes emissions from EM restoration activities (see Volume I, Section 4.7.2.2 of the SWEIS). As shown in Table 4.7.2-7, the difference in radionuclide emissions between on-site ORR monitoring sites and the off-site monitoring location (Station 52) is negligible. Separating clean-up emissions from other emissions would not be possible since it is not a point source like a production emissions stack.

Comment No. 22 **Issue Code: 12**

Section 4.11 in Volume I describes DOE's approach to the management of waste including waste generated at Y-12. The Waste Management PEIS (DOE/EIS-0200-F) analyzed the impacts of managing five types of waste generated at a number of DOE sites including ORR. The major types of waste generated at Y-12 from routine operations include LLW, mixed LLW, hazardous waste, and nonhazardous waste. Currently, solid mixed LLW is shipped to ETTP for incineration and off-site commercial vendors for treatment and disposal. Y-12 stores liquid LLW and mixed LLW for treatment and disposal and solid LLW is stored pending ORR availability of off-site or planned on-site disposal facilities. DOE prefers regional disposal of LLW and mixed LLW at Hanford and Nevada Test Site. A ROD for