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 February 20, 2001

Gary S. Hartman, U.S. Department of Energy
 Oak Ridge Operations, EM-912
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Subject: Comments on the Draft Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 Plant (December 2000; DOE/EIS-0309)

Dear Mr. Hartman:

I support Alternative 4 as presented in the draft Y-12 SWEIS: construction and operation of a new Special Materials Complex (SMC) and a new highly enriched uranium (HEU) Materials Facility.

1/22

The Draft SWEIS is well done and provides much information and understanding of the Y-12 mission. In addition, the inclusion of the two No Action alternatives is good.

Several sites are presented for the two proposed facilities. I am opposed to Site 1 for the SMC. It is described on pages 4-50, 5-17 and 5-29 as basically a greenfield site. In addition, it is also outside the generic modernization siting discussed below. The sites chosen in the final SWEIS must be consistent with overall modernization planning.

2/21

For the remaining facilities being considered in integrated modernization, as discussed in Section 3.3, generic siting is given, but not analyzed. I am opposed to Sites D and E, as they are inconsistent with recommendations as presented in Reference PEC 1998, the *Final Report of the Oak Ridge Reservation End Use Working Group (EUWG)*. Site D, which lies outside the PIDAS area in a zone with good potential for industrial reuse, and Site E, a generic greenfield site, both are in direct conflict with recommendations by the EUWG. The first End Use recommendation for Y-12 reads "The western area of the Y-12 Plant is expected to remain controlled industrial property. As opportunity arises, national security activities should be concentrated in the western area to allow for the broadest possible use of the rest of the plant." Additionally, the EUWG approved Community Guidelines that include recommendations calling for brownfield sites to be used for siting additional facilities instead of greenfield sites and the expeditious demolition of those structures unsuitable for future uses.

3/24

Since the draft Y-12 SWEIS did not analyze the environmental impacts of siting other new structures, upgrading usable buildings, and installing necessary utilities, the final SWEIS needs to either: (1) state clearly that a supplemental SWEIS will be provided detailing the overall modernization approach, providing environmental analysis and opportunity for public comment OR (2) retitle the final SWEIS as Phase 1. If this is not done, the subject document CANNOT BE CONSIDERED A SITE-WIDE EIS!

4/16

I appreciate the opportunity to provide comments on the draft SWEIS. Additional comments intended to improve the SWEIS are attached.

Sincerely,



Barbara A. Walton

Comment No. 1

Issue Code: 22

Comment noted.

Comment No. 2

Issue Code: 21

DOE recognizes that Site 1 for the proposed Special Materials Complex is just outside the proposed and recommended western development areas indicated in the End Use Working Group (EUWG) Report. However, all of Site 1 is not a greenfield site. A portion of Site 1 (about 10 acres) has been used as a construction lay-down area in the past and although legacy contamination from prior Y-12 operation support activities is not expected (Section 3.2.4.2), it cannot be totally ruled out without further extensive site testing. The ROD on the Y-12 SWEIS will identify DOE's decision and action on the Special Materials Complex and siting.

Comment No. 3

Issue Code: 24

Sites D and E referred to by the commentor are two of the five possible candidate site areas used in the screening process for possible site alternatives for future modernization facilities. As shown in Volume I, Figure 3.3-1 of the SWEIS, these are broad study areas, not sites. Site D is outside the EUWG recommended areas for production facilities, but is suitable for administrative and other non-production support activities and functions. Site E, a greenfield site, is considered in the screening process of potential sites for completeness in evaluation. DOE uses screening criteria and appropriate weighting factors developed for each specific proposed project in identifying potential siting alternatives. The recommendations of the EUWG are considered in the siting criteria. Future modernization projects not included in the SWEIS would be subjected to appropriate site screening and evaluation to determine reasonable alternative sites to be analyzed under NEPA.

Additional Comments on Y-12 SWEIS:	Barbara A Walton
1. (pages 4-4&5) The boundaries of the NERP are unclear. In addition, reference LMER 1998b cannot be found in Chapter 10.	5/01
2. (page 4-24) This figure is mistitled.	6/04
3. (page 4-25) The location for this section should be indicated, perhaps on Figure 4.4.2-1.	7/04
4. The ASER for 1999 was published in September 2000 (DOE/ORO/2100). Data from this should be used to update Section 4.7.2. Page 5-1 and elsewhere, as needed, should also be updated to reflect the availability of more recent data. This should include revision of Alternative 1A and analysis, if necessary.	8/07
5. Retitle Alternatives 2, 3 and 4 as "Action Alternative Planning Basis Operations Plus ...".	9/23
6. The location of the PIDAS should be shown for each alternative in the Final SWEIS (Figures 1.1.4-2, 3.2.2-2, etc.).	10/24
7. (page 5-39) There is a typo "HUE" in the 1st line of the next-to-last paragraph.	11/07
8. Table A.4-2, which is 26 pages long, is difficult to use; please add an index by building number.	12/24
9. References should be consistent throughout the document. LMES 1999d (page 10-14) is given as Y-12 1999 in Appendix A (page A89).	13/24

Comment No. 4

Issue Code: 16

Segmentation involves separately analyzing connected and cumulative actions in order to reduce the significance of the environmental impacts of an action as a whole. CEQ's regulations are directed at avoiding improper segmentation, and the Y-12 was prepared in accordance with CEQ regulations. The proposed action and alternatives in the Y-12 SWEIS are independent of other potential future modernization actions at Y-12. Any future proposals will be the subject of separate NEPA reviews if and when it is decided to move forward with specific actions.

The purpose of the SWEIS is to analyze the impacts of the proposed actions and alternatives. Current and ongoing actions are addressed under the No Action - Status Quo Alternative. While the proposed HEU Materials Facility and the Special Materials Complex have progressed to the conceptual design level, other facilities at Y-12 being considered for modernization are still in the very early planning phases at this time. Table 3.3-1 provides a summary of the potential new facilities. None of potential future modification projects are included in the No Action - Planning Basis Operations Alternative. Two modernization projects are included in the action alternatives for the Y-12 HEU Storage Mission and Special Materials Mission as discussed in Sections 3.2.3, 3.2.4, and 3.2.5. If and when new modernization projects are proposed for Y-12 (i.e., they are ripe for discussion), separate NEPA analyses will be conducted. Sections 1.1.3 and 3.3 discuss the Y-12 Modernization Program.

Comment No. 5

Issue Code: 01

Figure 4.1.1-3 has been modified. The boundaries to the National Environmental Research Park in Figure 4.1.1-3 have now been clearly defined. The reference LMER 1998b in Section 4.1.1 was left over from a previous draft and no longer applies. The citation has been deleted in the Final SWEIS.

Comment No. 6

Issue Code: 04

Commentor is correct. Figure 4.4.2-1 has been retitled "Geological Map of the Y-12 Site."

Comment No. 7 **Issue Code: 04**

In Figure 4.4.2-2, the stratigraphic sections represent the general stratigraphy of the Y-12 Site which includes the Upper East Fork Poplar Creek Characterization Area. Since the stratigraphic sections are consistent throughout the site, the figure has been renamed to indicate the geology of the Y-12 Area.

Comment No. 8 **Issue Code: 07**

All relevant sections of the Y-12 SWEIS have been updated based on the 1999 Annual Site Environmental Report (DOE/ORO/2100).

Comment No. 9 **Issue Code: 23**

DOE believes that the Y-12 SWEIS alternative names are appropriate because the use of No Action in each alternative reflects the continuation of current missions at Y-12 (i.e., No Action Planning Basis Operations), in addition to the proposed modernization actions.

Comment No. 10 **Issue Code: 24**

For security reasons, the location of the PIDAS is not shown for each alternative in the Final SWEIS. However, the general area within the PIDAS is shown in Volume II, Figure E.4.2-1.

Comment No. 11 **Issue Code: 07**

The typo "HUE" in Section 5.7.1.4 has been corrected.

Comment No. 12 **Issue Code: 24**

The list of Y-12 facilities in Volume II, Table A.4-2 is arranged by mission. This approach was considered to be more appropriate to support the evaluation of alternatives, and provide a clearer picture of the buildings' use and tenants for later use of the Y-12 SWEIS in subsequent NEPA reviews.

Comment No. 13 **Issue Code: 24**

A consistency review of all references has been conducted and appropriate changes have been made.