



Environmental Bulletin

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from the Savannah River Site

NEPA's Role in D&D

The objective of the National Environmental Policy Act (NEPA) is to ensure that Federal agencies such as the Department of Energy (DOE) incorporate environmental considerations into their planning process for all major Federal actions. Since 2002, the deactivation and decommissioning (D&D) of numerous facilities at the Savannah River Site (SRS) has been a major activity undertaken by DOE. NEPA plays a critical role in this sitewide D&D effort.

Using the graded approach developed for D&D at SRS, facilities are decommissioned by demolition and removal and, when necessary, by *in situ* entombment. From a regulatory perspective, the vast majority of these facilities are "clean" (i.e., no contamination present) and are decommissioned under a process called the "simple model." Conversely, nuclear, radiological and chemical facilities with a potential for contaminant release to the environment are decommissioned under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process and managed as non-time critical removal actions.

D&D actions carried out using the simple model for uncontaminated facilities are subject to NEPA review. SRS has applied categorical exclusions (CXs) and referred to the SRS Waste Management Environmental Impact Statement (WM EIS) (DOE/EIS-0217, 1995) as the NEPA review for these actions. By definition, CXs are applicable to those actions which can be shown to not individually or cumulatively have a significant effect on the human environment. While the direct environmental impacts of demolishing individual clean facilities are negligible, the potential cumulative environmental impact of the total waste volume generated by all such D&D actions may be significant. However, the assessment of the maximum waste forecast for all SRS D&D-related activities in the WM EIS demonstrates that the projected waste volumes can be safely managed and disposed of

using existing SRS waste disposal capacity with no significant environmental impacts. Based upon the use of existing NEPA impact assessments and the application of CX determinations, the NEPA process is being used to support accelerated cleanup at SRS in a cost-effective, time-efficient, environmentally safe manner.

It is DOE's policy that for actions carried out under CERCLA, the CERCLA document stands as the environmental review for the action, and separate NEPA review is not performed. For the facilities being decommissioned as a non-time critical CERCLA removal action, an engineering evaluation/cost analysis (EE/CA) is prepared to assess the feasible and cost-effective alternatives for that decommissioning activity. The EE/CA further recommends a specific removal action under CERCLA. Pursuant to DOE guidance for decommissioning (DOE G 430.1-4), NEPA "values" are incorporated in "decisions and documents as part of the CERCLA process." These values include socioeconomics, threatened and endangered species, natural/cultural resources, transportation, accident analyses, environmental justice and cumulative impacts. The impacts on these aspects of the human environment are not otherwise addressed within the CERCLA process. This integration provides a more comprehensive analysis of potential impacts resulting from these proposed SRS decommissioning activities.

In spite of its low profile within the D&D world at SRS, NEPA continues to serve the public and protect the human environment through its assessment activities and oversight.

If you would like further information about the site NEPA process or NEPA's role in D&D at SRS, please contact:

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Draft SRS Natural Resources Management Plan

At the direction of DOE, the U.S. Forest Service-Savannah River is preparing a revised Natural Resources Management Plan (NRMP) for SRS. The present SRS NRMP, issued in 1991, was developed to provide direction for management of the site's natural resources. Since issuance of the 1991 NRMP, the roles of the site organizations that manage SRS natural resources have both changed and expanded. The proposed revision of the SRS NRMP would encompass new responsibilities, clarify existing ones, guide the selection and implementation of site-specific actions, and tie the various SRS organization natural resource issues to DOE environmental stewardship missions and budget processes. DOE will review the NRMP and prepare the appropriate NEPA review. The draft NRMP is scheduled to be available for public review in January 2005 in *.pdf and hardcopy format. If you would like a copy of the draft NRMP when it becomes available, please make request to contact at bottom of this page.

EA being prepared for NPDES Wastewater Permit Compliance Alternatives at SRS

DOE has determined that an environmental assessment (EA) will be prepared to analyze potential environmental consequences associated with the proposed National Pollutant Discharge Elimination System (NPDES) Wastewater Permit Compliance Alternatives at SRS (DOE/EA-1513). The South Carolina Department of Health and Environmental Control has recently renewed SRS's NPDES Permit. This permit authorizes the continued discharge of wastewater effluents from SRS operations through 25 outfalls into State surface waters for the next five years. Compliance schedules have been negotiated with the State for certain outfalls to assist in meeting the new more restrictive permit limitations.

A range of alternative actions to facilitate permit compliance at these outfalls has been identified and will be reviewed in this EA. These alternative actions include (a) elimination of source waste discharges (e.g., facility deactivation, recycling of waste discharges), (b) treatment of waste discharges by constructed wetlands, ion exchange, or peat beds, (c) rerouting of waste discharges to the Central Sanitary Wastewater Treatment Facility or Effluent Treatment Facility for treatment and subsequent discharge, (d) relocation of outfalls to take advantage of natural attenuation processes, (e) reclassification of outfalls from industrial wastewater to storm water, and (f) rerouting of waste discharges to Upper Three Runs or Fourmile Branch to take advantage of increased stream assimilative processes. A floodplain/wetland assessment will also be included in this NEPA review.

Notifications of DOE's intent to prepare this EA were sent to the States of Georgia and South Carolina on November 2, 2004.

If you would like a copy of the predecisional EA when it becomes available, please contact:

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Current NEPA Actions Affecting SRS

- ***Disposition of Scrap Metals Programmatic Environmental Impact Statement (PEIS) (DOE/EIS-0327)***

This PEIS will evaluate alternatives for disposition of DOE scrap metals that may have been in radiological areas. The disposition options to be analyzed include continuation of the suspension on unrestricted release of metals for recycling, unrestricted release of scrap metals for recycling, and disposal. The notice of intent (NOI) for this PEIS was issued on July 12, 2001. A public scoping meeting was held on July 31, 2001, in North Augusta, South Carolina. The schedule is uncertain.

- ***Supplemental PEIS on Stockpile Stewardship and Management for a Modern Pit Facility (DOE/EIS-0236-S2)***

This PEIS will evaluate alternative sites (Los Alamos National Laboratory, Nevada Test Site, Pantex Plant, Waste Isolation Pilot Plant, and Savannah River Site) for a Modern Pit Facility, to provide the capability to manufacture plutonium pits for the United States nuclear weapons stockpile. This PEIS will be followed by a site-specific EIS to address the impacts of construction and operation of the Modern Pit Facility at the selected site. The NOI for this PEIS was issued on September 23, 2002. A local public scoping meeting was held on October 29, 2002, in North Augusta, SC. Information regarding the draft PEIS can be found at 68 FR 33487, June 4, 2003. The draft PEIS may be viewed electronically at www.mpfeis.com. The final supplemental PEIS has been delayed due to Congressional concerns about timing and scope of project.

- ***West Valley Demonstration Project (WVDP) Waste Management EIS (DOE/EIS-0337)***

DOE's proposed action (and preferred alternative) is to ship radioactive wastes that are either currently in storage on the WVDP site, or that will be generated from WVDP operations over the next ten years, to offsite disposal locations, and to continue managing its onsite waste storage tanks. The potential environmental consequences of the proposed action are evaluated in the final EIS, including impacts to workers and the public from waste transportation and waste management. The final EIS also analyzes an alternative under which certain wastes would be shipped to interim offsite storage locations including SRS prior to disposal. The preferred alternative does not involve SRS. The final PEIS was issued in January 2004 and may be viewed electronically at <http://tis.eh.doe.gov/nepa/eis/eis0337/index.html>. The ROD is scheduled to be issued in December 2004.

- ***Construction and Operation of a Mixed Oxide Fuel Fabrication Facility at SRS (NUREG-1767)***

DOE has contracted with Duke Cogema Stone & Webster to design, construct, and operate a proposed Mixed Oxide (MOX) Fuel Fabrication Facility that would convert depleted uranium and weapons-grade plutonium into MOX fuel. The proposed MOX facility would be located on the DOE's SRS in South Carolina. Use of the proposed facility to produce MOX fuel would be part of the DOE's surplus plutonium disposition program. The purpose of the DOE program is to ensure the plutonium produced for nuclear weapons and declared excess to national security is converted to proliferation-resistant forms. The final EIS and the final Safety Evaluation Report are scheduled to be available for public review in January 2005.

- ***Natural Resources Management Activities at SRS (DOE/EA-0826)***

DOE is preparing a revised Natural Resources Management Plan (NRMP) for SRS. DOE prepared an environmental assessment (EA) in 1993 to analyze the potential environmental impacts of continued management of SRS natural resources. Based on the analyses in the EA, DOE determined the proposed action was not a major Federal action significantly affecting the human environment within the meaning of NEPA, and issued a finding of no significant impact (FONSI). In 2000, DOE issued a revised FONSI that determined implementation of a revised *Red-Cockaded Woodpecker Management Plan* would have impacts no greater than those described in the 1993 EA. The draft NRMP is scheduled to be available for public review in January 2005 and the final issued in March 2005. DOE will review the NRMP and prepare the appropriate NEPA review. (see related article on page 2)

- ***National Pollutant Discharge Elimination System (NPDES) Wastewater Permit Compliance Alternatives at SRS (DOE/EA-1513)***

The South Carolina Department of Health and Environmental Control has recently renewed SRS's NPDES Permit. This permit authorizes the continued discharge of wastewater effluents from SRS operations through 25 outfalls into State surface waters for the next five years. Compliance schedules have been negotiated with the State for certain outfalls to assist in meeting the new more restrictive permit limitations. A range of alternative actions to facilitate permit compliance at these outfalls has been identified and will be reviewed in this EA. A floodplain/wetland assessment will also be part of this NEPA review. (see related article on page 2)

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The SRS Environmental Bulletin

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