

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION Division of Remediation, Oak Ridge Office

761 Emory Valley Road Oak Ridge, Tennessee 37830

September 13, 2024

Mr. Roger Petrie Oak Ridge Office of Environmental Management U.S. Department of Energy Post Office Box 2001 Oak Ridge, Tennessee 37831 RECEIVE SEP 16 2024 COUNTY MAYOR'S OFFICE

Dear Mr. Petrie

RE: Transmittal of the Phased Construction Completion Report for Remaining Pre-Demolition Activities and Demolition of Building 3005, the Low Intensity Test Reactor at the Oak Ridge National Laboratory, Oak Ridge, Tennessee (DOE/OR/01-2963&D1)

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced Phased Construction Completion Report (PCCR) on June 18, 2024. The document has been reviewed pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation. The following comments are relevant to that review:

- The PCCR does not address the requirements of the FFA Appendix I-5 Operating Instruction (Operable Unit Information Assessment) for the Building 3005 project site. Please revise the document to include language relevant to the operating instruction.
- 2. <u>Page 15, Section 4.2, 1st bullet, 2nd paragraph</u>. This paragraph discusses the data quality assessment (DQA) that was conducted for waste characterization. TDEC requests that any waste characterization DQAs conducted for waste associated with this project be attached to the PCCR.
- **3.** <u>Page 16, 3rd bullet</u>. Please include a figure that identifies the location of the installed stormwater controls.
- 4. <u>Pages 19-20, Table 1</u>. For clarity, highlight the demolition monitoring results that are higher than the baseline monitoring results.
- Page 30, Table 2. The location information associated with each sample location identifier is not specific enough to identify the exact sample collection point. For example, for sample 3005-OS99-01 it cannot be determined what wall of the sub-pile

room was sampled. TDEC requests that the data summary information for the subsurface characterization be attached to this PCCR.

Review of this document meets the review cycle protocol of 90 days. Questions or comments concerning the contents of this letter should be directed to Angel Perkey at the above address or by phone at (865) 985-6851.

Sincerely

Randy Young Digitally signed by Randy Young Date: 2024.09.12 12:58:22 -04'00'

Randy C. Young FFA Project Manager Division of Remediation – Oak Ridge Office

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