

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION Division of Remediation, Oak Ridge Office 761 Emory Valley Road Oak Ridge, Tennessee 37830

October 18, 2024

Mr. Roger Petrie Oak Ridge Office of Environmental Management U.S. Department of Energy Post Office Box 2001 Oak Ridge, Tennessee 37831

Dear Mr. Petrie

TDEC Comment Letter for Action Memorandum for North Tributary-8 at the Y-12 National Security Complex Bear Creek Burial Grounds, Oak Ridge, Tennessee (DOE/OR/01-2986&D1)

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced submittal on September 17, 2024. The document has been reviewed pursuant to the Federal Facility Agreement for the Oak Ridge Reservation. The following paragraph and comments are relevant to the review of this document.

TDEC understands the purpose of this Action Memorandum (AM) is to identify the selected removal action from the Engineering Evaluation/Cost Analysis (EE/CA) for the reduction of uranium discharge to North Tributary-8 (NT-8) and is not intended to identify a final remedy for the contaminant releases from NT-8.

Specific Comments

- 1. <u>Page 7, Section 4.0 fifth bullet</u>. Please revise the bullet to state that the quarterly inspections will be added to the Bear Creek Valley Watershed Remedial Action Report Comprehensive Monitoring Plan.
- 2. <u>Page 8, Section 4.1 first sentence.</u> This sentence states that the non-time critical removal action included in this AM includes water treatment. The alternative selected under this AM does not include water treatment, please correct.
- **3.** <u>Appendix A, Table A.1.</u> Please provide clarification on what media or chemical release mechanism is planned to be addressed by the U.S. Department of Energy Order 458.1. Applicable or Relevant and Appropriate Requirements addressing potential radiological releases should incorporate the U.S. Environmental Protection Agency dosage risk range where appropriate.

Mr. Roger Petrie October 18, 2024 Page 2 of 2

Review of this document meets the review cycle protocol of 30 days. Questions or comments concerning the contents of this letter should be directed to David Carlone at the above address or by phone at (865) 839-3362.

Sincerely

Randy Young Digitally signed by Randy Young Date: 2024.10.17 13:36:01 -04'00'

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

ec: Samantha Urquhart-Foster – EPA Jon Richards – EPA Jana Dawson – EPA Jason Poe - EPA Sam Scheffler – DOE Brian Henry – DOE Joanna Hardin – DOE Joanna Hardin – DOE Morgan Carden – DOE Tanya Salamacha – UCOR Sid Garland – UCOR ORSSAB OREM Mailroom Colby Morgan – TDEC Dana Casey – TDEC xc: Wade Creswell – ORRCA Amy Fitzgerald – ORRCA Terry Frank - ORRCA Warren Gooch – ORRCA