



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Remediation - Oak Ridge  
761 Emory Valley Road  
Oak Ridge, Tennessee 37830

RECEIVED  
AUG 11 2025  
COUNTY MAYOR'S OFFICE

August 8, 2025

Mr. Roger Petrie  
Federal Facility Agreement Manager  
U.S. Department of Energy  
Oak Ridge Office of Environmental Management  
Post Office Box 4067  
Oak Ridge, TN 37831

Dear Mr. Petrie

**Re: Transmittal of Memorandum to File, Non-Significant Change to the Record of Decision for Interim Actions in Bethel Valley, Oak Ridge, Tennessee (DOE/OR/01-1862&D4)**

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced submittal on June 11, 2025. The Non-Significant Change (NSC) allows information in the Bethel Valley (BV) Record of Decision for Interim Actions (IROD) regarding requirements for the sumps to be discussed in project-specific addenda to the Remedial Design Report/Remedial Action Work Plan for Soils, Sediments, and Dynamic Characterization Strategy for Bethel Valley, and the Remedial Design Report/Remedial Action Work Plan for the Decontamination and Decommissioning of Non-Reactor Facilities in Bethel Valley. The document has been reviewed pursuant to Section XXX of the Federal Facility Agreement (FFA) for the Oak Ridge Reservation. The following comments are relevant to that review:

1. Please include a map illustrating the locations of the Core Hole 8 wells and sumps, the Sr-90 contaminated sumps, and the mercury contaminated sumps. A table should accompany this figure that summarizes the current operational status of each of these wells/sumps and also identifies what document the project-specific addenda will be associated with for each location.
2. Insert a sentence under the *Rationale for Non-Significant Change* that states, 'Per the IROD, collection and treatment of groundwater will continue until a final groundwater decision is made. Due to the need to turn off select pumping locations, alternative locations for collecting and treating groundwater will be identified in project-specific addenda to be approved by the tri-parties.'
3. Add a statement that states, 'Tri-party approval is required before the sumps/wells are turned off.'

4. Identify which document the project-specific addenda will be attached to for the sumps associated with reactor facilities (e.g. 3042).
5. Revise this sentence to say, *'Due to anticipated changes to the number of active sumps and the impracticable nature of iterative revisions to the BV IROD, this non-significant change (NSC) directs the documentation of any status changes of active sumps and decisions on offset location(s) to be addressed on a case-by-case basis in project-specific work plan.'*

This document has a review cycle protocol of 60 days. Questions or comments concerning the contents of this letter should be directed to Jessica Core at the above address or by phone at (865) 895-0795.

Sincerely

A handwritten signature in blue ink, appearing to read "C. Young", followed by the word "for" in a cursive script.

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

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