



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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

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COUNTY MAYOR'S OFFICE

December 10, 2025

Mr. Roger Petrie
Oak Ridge Office of Environmental Management
U.S. Department of Energy
Post Office Box 4067
Oak Ridge, Tennessee 37831

Dear Mr. Petrie

**RE: Transmittal of the Phased Construction Completion Report for Decontamination
Laundry Demolition at the Oak Ridge National Laboratory (DOE/OR/01-3003&D1
[ORNL/TM-2025/5000])**

The Tennessee Department of Environment and Conservation, Division of Remediation-Oak Ridge Office, received the above referenced Phased Construction Completion Report (PCCR) on September 11, 2025. 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:

General Comments

1. The document should include a section that describes the final end state of the project site footprint. In accordance with the *Addendum to the Remedial Design Report/Remedial Action Work Plan for the Decontamination and Decommissioning of Non-Reactor Facilities in Bethel Valley at the Oak Ridge National Laboratory, Oak Ridge, Tennessee: Demolition of Building 2523 and Annex 2523A (RDR/RAWP)*, the following information should be included in the PCCR:
 - Final site conditions
 - Post-demolition radiological surveys of the slab
 - Results of visual inspection of the slab for chemical contamination
 - Radiological survey results from the trench prior to stabilization
 - Final radiological surveys of the slab following application of flowable fill concrete
 - Characterization activities conducted at the Building 2517 footprint to ensure staging of waste did not impact the area

2. An assessment of the potential environmental impacts from classified contaminants should be conducted for Building 2523 and Annex 2523A, as defined by the FFA Appendix I-5 Operable Unit Information Assessment Operating Instruction. The PCCR should discuss the assessment and summarize any unexpected contaminants that were identified during characterization. Alternatively, a separate briefing and documentation can be prepared to address identified classification concerns.

Specific Comments

1. **Page vii, first paragraph:** This paragraph discusses removal of portions of the foundations/stairs of Building 2517. Building 2517 was not included in the scope of the RDR/RAWP. Additional background information for Building 2517 should be included in the document.
2. **Page ix, last paragraph:** The eighth sentence says the flowable fill will provide a permanent "cap" to the slab. Please rephrase this sentence as permanent decisions on the slab are not within the scope of this remedial action.
3. **Page ix, last paragraph:** In the last sentence, define "near future" for the demolition of the slab.
4. **Page 2, Figure 2:** Figure 2 is difficult to read. Please provide a better figure that shows the locations of the facilities with respect to the nearby stormwater inlet drains.
5. **Page 4, first paragraph:** Include a more detailed summary of associated contaminants to better inform future remedial actions (i.e., soil remediation and slab removal).
6. **Page 4, second paragraph:** Identify if the "leaks from obsolete underground waste lines" are associated with Building 2523. In addition, the U.S. Department of Energy (DOE) should confirm that these leaks are documented in Appendix C of the FFA.
7. **Page 4, second paragraph:** Include the results of the smears collected for radiological analysis from the above-ground tank interior.
8. **Page 6, last paragraph:** This paragraph should discuss that portions of the foundations/stairs of Building 2517 were removed and whether the removal resulted in disturbance of the surrounding soil.
9. **Page 7, second paragraph:** Page ix says that the slab is to be removed in the "near future"; however, the statement here implies that it is unknown if or when the slab will be removed. Please clarify.
10. **Page 7, last paragraph:** Provide a figure that shows the layout of Building 2523, including the posted radiological areas and Room L107.

11. **Page 9, Section 4.2:** Please provide a map that identifies the location of the sampling sites.
12. **Page 9, third paragraph:** Clarify if any baseline (pre-demolition) sampling was conducted. Based on the information provided, it seems as though only two rain event samples were collected during demolition and one sample collected post-demolition. It is not clear from which location the samples were collected. According to the RDR/RAWP, three baseline samples should have been collected, as well as three post-demolition samples. Provide an explanation for why all the required sampling was not conducted. Also, it would also be helpful to identify the demolition start and completion dates in the narrative.
13. **Pages 10-11:** The environmental sampling data lab report is not legible. Please provide a legible copy of the report.
14. **Page 13, Table 2:** Identify where the foundations/stairs from Building 2517 were disposed. Also, identify if accumulated stormwater was disposed per the RDR/RAWP. Finally, explain why the disposed volume of waste is significantly lower than the estimated volume identified in the RDR/RAWP.
15. **Page 16, Section 8:** Provisional management requirements should be identified for the slab. Provisional management should include routine inspections and radiological surveys to ensure the integrity of the followable fill cap is maintained and no migration of contamination occurs. The identified provisional management requirements should be added to the Bethel Valley Administrative Watershed Remedial Action Report Comprehensive Monitoring Plan.

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



Eileen Marcillo
FFA Project Manager
Division of Remediation – Oak Ridge Office

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