



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

RECEIVED  
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COUNTY MAYOR'S OFFICE

February 12, 2026

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: Phased Construction Completion Report for Remediation of Soils in the West Bethel Valley Assessment Unit 8 at the Oak Ridge National Laboratory, Oak Ridge, Tennessee (DOE/OR/01-3020&D1)**

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced submittal on November 18, 2025. The submittal documents the completion of remediation under the Bethel Valley (BV) Interim Record of Decision (IROD) of radiological contamination identified in several areas of the Assessment Unit (AU) and provides the AU-wide evaluation of the remaining soil. 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:

General Comments

- 1) Text and figures throughout the main text and Attachment D include language that explains how location coordinates are represented incorrectly due to GPS errors from 2010. If evidence has been found that soil sample locations are represented incorrectly and new coordinates are identified, the U.S. Department of Energy (DOE) should correct those coordinates both in the Oak Ridge Environmental Information System (OREIS) and in the associated figures prior to submitting a final completion report to ensure these locations are represented accurately for future projects. Please update the locations for the samples with the correct coordinates.
- 2) For consistency with the revisions made to other Phase Construction Completion Reports (PCCRs) in the area, please include the following language in main text Sections 6.0 and 7.0:  
*Though evaluation and discussion of MCL-based soil screening levels is required per the BV S&S RDR/RAWP as part of the threat to groundwater analysis, these screening levels are provided for informational purposes only and cleanup is driven by an industrial worker risk scenario. The BV S&S RDR/RAWP is an interim action and does not use MCL-based soil cleanup levels in accordance with federal and state regulations. A future final ROD will need*

*to address soil as a threat to groundwater and further characterization and/or remedial actions may be necessary in the WBV 8 AU. Until a final decision is in place for the area, if redevelopment or disturbance of soils in WBV 8 occurs, the tri-parties should determine if there is a need for CERCLA oversight.*

#### Specific Comments

- 1) Page ES-1, 7<sup>th</sup> bullet point – Please change the language here to state that No Further Action (NFA) is recommended ‘per the BV IROD’. This change should be made globally throughout the document. Other locations within the text where this change should be made include Page 1-1, Section 1, 4<sup>th</sup> bullet point; Page 3-1, Section 3, first paragraph; Section 7.0; and Appendix D, Section D.1.
- 2) Page 4-10, Section 4.3, Table 3 – The results for cesium-137 exceeded 25% of the average remediation level (RL) (7 picocuries per gram) in 6 of the 7 composite samples and exceeded the average RL in 1 of 7 samples. Section 3.9.3 of the BV Remedial Design Report (RDR)/Remedial Action Work Plan (RAWP) states that if analytical results are greater than 25% of an average RL in a composite sample, then discrete samples will be collected and Section 3.10 of the RDR/RAWP states “the confirmation sampling approach mirrors the characterization approach because the ultimate decision is whether further action is necessary.” Please explain how the requirement for discrete sampling was addressed during this evaluation.
- 3) Page 4-2, Section 4.1, Figure 6 – As shown on this figure, two soil samples collected in 2023 are located outside of the WBV 8 AU (WBV8B-322 and WBV8B-321). Were the results from these samples included in the mean calculations used to evaluate average RL exceedances and/or aggregate risk? If so, why?
- 4) Appendix D, Section D.5.3.4, last paragraph – Please change the language here to clarify that there is no threat to groundwater “as per the BV Interim ROD criteria”. This change should be made globally throughout the document. Other locations within the text where this change should be made include Appendix D, Section D.6, 3<sup>rd</sup> bullet and Appendix D, Section D.6, last paragraph, first sentence.
- 5) Appendix D, Section D.6, last paragraph, last sentence – Please change the language here to clarify that the NFA decision is “under the BV Interim ROD” and add text that clarifies a final groundwater decision has not yet been made and will be determined under a future BV final decision document.

This document has a review cycle protocol of 90 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

**Eileen Marcillo** Digitally signed by Eileen Marcillo  
Date: 2026.02.11 10:45:30 -05'00'

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

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