

July 31, 2013

Mr. William Levitan
Associate Deputy Assistant Secretary
of Site Restoration
Office of Environmental Management
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF COMMENTS AND REQUESTS FOR ADDITIONAL INFORMATION ON THE "DRAFT BASIS FOR SECTION 3116 DETERMINATION FOR CLOSURE OF H-TANK FARM AT THE SAVANNAH RIVER SITE," DOE/SRS-WD-2013-001 REV. 0 AND ON "PERFORMANCEASSESSMENT FOR THE H-AREA TANK FARM FOR THE SAVANNAH RIVER SITE,"SRR-CWDA-2012-00128 REV. 1

Dear Mr. Levitan:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the subject reports and associated documentation submitted by the U.S. Department of Energy (DOE) letter dated February 6, 2013 (M. Gilbertson to L. Camper), pursuant to Section 3116 of the Ronald W. Reagan National Defense Authorization Act of 2005. Enclosed for your consideration are the NRC's comments which are comprised of Requests for Additional Information (RAIs) and clarifications related to these documents.

NRC staff believes that DOE responses to the enclosed RAIs will enhance our overall understanding of and confidence in, the ability of DOE to meet the three criteria established in Section 3116. Further, the responses will aid NRC's efforts to complete, in a timely manner, the Technical Evaluation Report (TER) that will represent the primary work product of NRC's consultation on H-Area Tank Farm.

NRC staff has no concerns related to Criterion 1, the need to dispose of residual waste in a geologic repository.

NRC staff inquiries regarding Criterion 2, the removal of highly radioactive radionuclides to the maximum extent practical, relate primarily to selection and application of cleaning technology as well as technology optimization, and waste removal efficiency. NRC staff believes that DOE responses to the inquiries will provide increased confidence and transparency regarding contaminant removal efforts

The primary areas where additional information is needed to support the NRC staff conclusions with respect to the ability of the site to meet 10 CFR Part 61 Class C concentration limits and/or performance objectives (Criterion 3) are related to the validity of conceptual models, model

abstractions, and the supporting technical basis for models and model results. Staff has offered no comments related to waste classification, closure cap modeling or site stability beyond those already provided from F Area Tank Farm consultation that remain relevant for H Area Tank Farm.

Many of the NRC questions and comments seek to achieve better alignment between DOE and NRC with respect to the information needed for NRC to have reasonable assurance that performance objectives contained in 10 CFR Part 61, Subpart C, can be met. Due to the complexity of this project, NRC staff expects that DOE may not have sufficient time to address all of the technical issues raised in the RAIs to support completion of NRC's TER. Nonetheless, it will be helpful if DOE can provide as much information as possible in response to the enclosed RAIs to reduce the number of assumptions that need to be verified later. This, in turn, may reduce the number of factors the NRC will need to consider during the monitoring phase to ensure that the facility complies with performance goals.

NRC staff appreciated the time and effort by DOE staff and contractors in the form of clarifying teleconferences during the preparation of these RAIs. The teleconferences were beneficial in enhancing NRC staff understanding of DOE's analytical approach. As such, they were beneficial in reducing the number and enhancing the focus of these RAIs.

Further explanation of the staff's basis for requesting additional information is contained within the body of the attachment. In order to assist DOE in meeting its schedule for finalizing its Waste Determination for the H-Tank Farm, we will be happy to discuss our comments.

If you have any questions, please contact James Shaffner of my staff at 301-415-5496.

Sincerely,

/RA by Janelle Jessie Acting for/

Aby Mohseni, Deputy Director
Environmental Protection and
Performance Assessment Directorate
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

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