STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DOE OVERSIGHT DIVISION
761 EMORY VALLEY ROAD
OAK RIDGE, TENNESSEE 37830-7072

June 17, 2002

David R. Allen
US Department of Energy
Oak Ridge Operations Office
200 Administration Road
Oak Ridge, Tennessee 37830

Dear Mr. Allen

National Environmental Policy Programmatic Environmental Assessment (PEA) for the U.S Department of Energy, Oak Ridge Operations' Implementation of a Comprehensive Management Program for the storage, transportation, and disposition of potentially re-usable Uranium materials (DOE/EA-1393)

The Tennessee Department of Environment and Conservation, DOE Oversight Division has reviewed the subject document in accordance with the requirements of the National Environmental Policy Act and associated regulations of 40 CFR 1500-1508 and 10 CFR as implemented.

General Comments:

The state of Tennessee concurs with the PEA document supporting the selection of Portsmouth Gaseous Diffusion Plant as the preferred option for the reasons as stated in the following sections located on Page 4-6, Paragraphs 1 and 2. "*PORTS is the only DOE site with sufficient existing storage space to accommodate the entire uranium material inventory. PORTS has several large buildings with sufficient capacity to store these materials. These buildings were evaluated for uranium storage suitability (DOE 1999), and over 450,000 ft^2 of space is still available in them...Even with some new construction, the PORTS site would still be the least expensive site for this alternative" (centralized storage at a single DOE site).*

Acknowledging that uranium wastes are not part of the scope of this PEA, the document should identify and address any waste streams associated with the re-usable uranium materials. The PEA should provide maps of probable transportation routes.

The management plan defined by this PEA is considered a long-term plan describing several possible disposition scenarios; however, the actual disposition of the surplus material is undefined at this time. The state of Tennessee reiterates its position on not being willing to accept any materials designated for re-use/recycle without definite disposition pathways which may accumulate to long term storage or any waste that may require long term storage prior to treatment/disposition.

Specific Comments:

Section 2.1 Page 2-1, the typical end-use products are stated as metal or UO_2. On page 2-3, Fernald's largest inventories that fall within the scope of this PEA are stated to be in the form of metal and UF_4. The UF_4 should be added to the statement on page 2-1 that defines the scope.

If you have any questions concerning these comments, please contact me at 865-481-0995.

Sincerely

John Owsley
Director

xc: Dodd Galbreath-TDEC/EPO
Eddie Nanny-TDEC/DRH

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