



PADUCAH GASEOUS DIFFUSION PLANT CITIZENS ADVISORY BOARD

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Consensus Recommendation: 04-07

Title: End State Vision for the Paducah Gaseous Diffusion Plant Site

Background:

In November 2002, the Paducah Gaseous Diffusion Plant (PGDP) Citizens Advisory Board (CAB) requested that the U.S. Department of Energy (DOE) provide a list of topics for the CAB to work from in developing recommendations. In DOE's response, the CAB was asked to focus on long term stewardship, specifically the CAB's End State Vision for the PGDP site.

In June 2003, the Long-Range Strategy/Stewardship task force began the process of obtaining input from the community for an End State Vision. The first meeting was attended by representatives of the CAB, DOE, the Kentucky Department of Waste Management, the West Kentucky Wildlife Management Area (WKWMA), the Greater Paducah Economic Development Council (GPEDC), the Paducah Area Community Reuse Organization (PACRO), Active Citizens for Truth (ACT), and the Coalition for Health Concerns. Also present were the McCracken Judge Executive, the Mayor of Paducah, the Paducah City Manager, and members of the public. In more recent meetings, the Board has also discussed this recommendation with the McCracken County Administrator.

Following development of the End State recommendation in draft form, presentations were made to various groups and organizations to obtain comments and suggestions on specific points contained within the recommendation. This information was presented to the PACRO Finance and Executive Committee, the Ballard County Chamber of Commerce, the Paducah Chamber of Commerce, ACT, and to the Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-550. Comments received from these meetings that were applicable have been incorporated into this recommendation. Throughout the eight-month process, the CAB's objective has been to include and represent the community in this matter.

Current Status:

To develop an End State Vision, certain facts concerning the current situation of the PGDP site must be considered. The United States Enrichment Corporation (USEC) leases the uranium enrichment facilities from DOE. While USEC has announced plans to build and operate a centrifuge facility in Ohio, replacing the older Paducah operation, there remains a possibility that use of the Paducah site could continue beyond 2010. Additionally, DOE has yet to announce if the Paducah site will transition immediately into Decontamination and Decommissioning (D&D) upon USEC's departure from the site, or if the site will be placed on standby while determining national energy needs.

Another event, redefining Paducah's future, is the construction of a Depleted Uranium Hexafluoride (DUF₆) Conversion Facility. Operation is scheduled to continue until 2030 or beyond and is viewed by the CAB as the first step in reindustrialization of the Paducah site. The progress by DOE in areas such as the North-South Diversion Ditch, the DUF₆ Conversion Facility, Six-Phase Heating Technology, Scrap Metal Removal, and the characterization and disposition of the DOE Material Storage Areas is considered a major step forward in developing a safe, reusable site.

The uncertainty of the future of the gaseous diffusion process coupled with reindustrialization (DUF₆), which has already begun, do in fact help define the End State Vision of this CAB. It is, however, the belief of this CAB that decisions made today regarding the end state of the PGDP will provide guidance for future generations as they implement and update this End State Vision.

Concern:

As the CAB worked toward its End State Vision, three items emerged as primary concerns:

- Environmental remediation as currently planned may not be sufficient to fully protect human health and the environment in the future without the possibility of reoccurring issues.
- Environmental remediation as currently planned may not be sufficient to allow the Paducah community every opportunity in reindustrializing the site, and thereby protecting and building upon the economic impact this site has on the region.
- If this community waited until USEC ceased operations and environmental remediation was completed before acting on its end state vision, many years that could have been productively used for reindustrialization planning and development would be lost.

Goal:

The three concerns stated above share a common and single solution; the level of environmental remediation must be sufficient to allow this community control of its future. Therefore, the goal of the Paducah CAB's End State Vision is as follows:

To protect human health and the environment while preparing for a viable economic future for the Paducah site.

Recommendation:

To achieve the goal of the CAB's End State Vision, the following recommendations are submitted:

- 1. DOE is encouraged to structure environmental remediation activities to allow continued nuclear and non-nuclear industrial use of the existing industrialized area and to continue recreation/wildlife use of those areas presently leased to the WKWMA.**
- 2. DOE begin investigating means to modify security access to non-USEC leased areas, allowing the reindustrialization process to move forward.**
- 3. DOE begin consultation with PACRO, GPEDC, and other involved parties to inventory and investigate buildings and facilities to determine potential reindustrialization value.**
- 4. DOE decontaminate the buildings, facilities, and surrounding grounds (scheduled for reuse) to the level necessary to allow this community every opportunity to obtain non-nuclear tenants for the site.**
- 5. DOE begin physical rehabilitation of infrastructure facilities identified as having potential for the reindustrialization process.**
- 6. DOE thoroughly characterize any contamination remaining at the site and adjoining property, after all environmental remediation activities are complete. This will allow the issuance of state**

and federal “covenant not to sue”, or an equivalent document, for future tenants and property owners.

7. DOE should investigate all possible alternatives to the proposed Comprehensive Environmental Recovery, Compensation, and Liability Act (CERCLA) waste disposal facility. There are four gaseous diffusion process buildings that have little, if any, potential for reindustrialization. The footprints of these buildings could be used for an above-ground concrete encapsulation of final D&D waste. This option is more acceptable to the community and may lower long-term costs for both Environmental Management (EM) and Legacy Management (LM).
8. DOE plan and initiate removal of all burial grounds within the industrial area. The potential for contaminant migration in the air, soil, groundwater and surface water is greatly increased if the burial grounds remain. The unexcavated burial grounds will negatively impact future industrial options for the site.
9. DOE, within two years, resolve the issue of institutional controls, compensation, or “buy out” with the property owners affected by off-site groundwater contamination.
10. DOE begin a public information/involvement process as soon as possible to educate the community on the transition from the Office of EM to the Office of LM, specifically addressing issues such as, but not limited to, long-term taxpayer costs (is the best financial decision for EM also the best financial decision for taxpayers throughout LM activities) LM monitoring of the site, and, if necessary, responding to new or migrating contaminants.
11. DOE remove sources and potential sources of off-site groundwater contamination.
12. DOE is encouraged to begin immediately working with the local communities to explore possibilities which address the three concerns listed above. The CAB offers the following as a means to begin achieving the common goal of this community:
 - Provide on-site facilities for environmental remediation/innovative technology companies.
 - Provide on-site facilities for the research being performed by the University of Kentucky for neptunium removal from nickel and use of converted depleted uranium. Upon success of this research, provide the necessary production facilities.
 - Explore the potential for the on-site development of Hazardous Material and Emergency Response Training facilities.
 - Explore the possibility of establishing an energy research technology park at the site.

Approved by Consensus March 18, 2004