

DCN: 12318

Baxter, Kristen, CIV, WSO-BRAC

From: Dukes, Philip [Philip.Dukes@ct.gov]
Sent: Wednesday, August 10, 2005 5:26 PM
To: Baxter, Kristen, CIV, WSO-BRAC
Subject: Questions for General Newton
Attachments: QuestionsfortheAugust11thenvironmentalhearing.doc

Kristen,

If you could pass the attached document and following message to Gen. Newton it would be greatly appreciated. Thank you so much.

General Newton,

In preparation for your hearing tomorrow, Team Connecticut has prepared a number of questions that we think raise serious questions regarding assumptions made in the BRAC process regarding closure and environmental remediation costs, particularly as they relate to Sub-base New London. We ask that you consider asking some of the attached questions at tomorrow's hearings and perhaps submit the remainder for the record. Again, we thank you for your generosity in talking to members of the delegation and in asking questions that assure that the process itself was comprehensive and did not substantially deviate from the criteria.

Thank you.

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8/10/2005

**Environmental Questions
for August 11 BRAC Commission Hearing**

For Use by Commissioners at Hearing

1. Assuming the \$23 million figure we have seen for the Groton Sub Base clean-up is just for already identified Superfund (CERCLA) requirements, how does DoD account for any clean-up requirements that must be met under other programs, including Underground Storage Tanks (USTs), Hazardous Waste (RCRA), Pesticides and PCBs?
2. Putting aside the Navy's position that remediation costs are irrelevant because they would be incurred under any scenario, please explain why no mention has been made of the clear environmental closure costs that would only be incurred if the base closes?
 - CT estimate: \$37 million (\$5.5 million, RCRA/UST; \$31.5 million, radiological).
3. In light of past experience regarding dramatic environmental clean-up cost underestimates in prior BRAC rounds, such as the Pease Air Force Base clean-up cited recently by GAO (that revealed has shown a 300%+ under-estimate regarding the number of contaminated areas), how can we be comfortable that any present cost estimates for environmental closure and remediation are accurate?

Prior examples:

- Stratford Army Engine Plant, 50% over BRAC cost estimates, could go to 500% if active groundwater remediation is required.
 - Naval Air Station South Weymouth, 400% over BRAC cost estimates.
 - Davisville Naval Construction Battalion Center, 50% over BRAC cost estimates.
4. To what degree was the U.S. Environmental Protection Agency involved in the DoD calculations of environmental restoration costs? Were EPA regional offices consulted by the services with respect to the cleanup of bases in their regions?
 5. Why didn't the Navy base its estimates for radiological cleanup on the Multi-Agency Radiological Survey and Site Investigation Manual (MARSSIM), a process DoD helped develop in 1997 and used today by other federal agencies?
 - a. Is it safe to say that the DoD radiological cleanup expense would be higher if they followed MARSSIM?
 - b. Do states have the ability to force the DoD to cleanup the base to MARSSIM standards? If states have higher standards for radiological cleanup, shouldn't DOD be expected to meet the state standards? What legal mechanism can they use?
 6. I understand that certain states, Connecticut for example, have higher standards for radiological cleanup than other states. Has DoD taken this into consideration and does DoD intend to meet the higher standards in a state like Connecticut?

For Written Submission

7. From what we understand of the early nuclear program, while the Navy has had strict controls in place for radioactive materials under the management of the Naval Nuclear Propulsion Program (NNPP), there is not a history of strict controls for radioactive materials used in other programs that are commonly referred to as "G-Ram." We also understand that the Navy never provided vital historical information on the uses of radiological materials not related to the NNPR.

- a) In light of this, how can the Navy accurately estimate the real cost of radiological cleanup at Groton without first completing an Historical Site Assessment consistent with the Multi-Agency Radiological Survey and Site Investigation Manual (MARSSIM)?
- b) Why hasn't the Navy shared G-RAM radiological contamination information with the State of Connecticut?
- c) Do we know what other information exists that is indicative of G-RAM radiological problems at Naval Submarine Base New London?

INFO FROM GOV. RELL

Baxter, Kristen, CIV, WSO-BRAC

From: Dukes, Philip [Philip.Dukes@ct.gov]
Sent: Wednesday, August 10, 2005 10:37 AM
To: kristen.baxter@wso.whs.mil
Subject: Document from Team Connecticut
Attachments: Questions for GAO on SUBASE1.doc

General Newton,

Team Connecticut has previously relied on individual Commissioners to submit questions to the General Accounting Office relating to the analysis that resulted in the recommendation to close Subase New London. We are hopeful that we can rely on you to perhaps submit the attached questions to the GAO to bring attention to critical flaws we believe GAO can confirm in the DoD analysis. We thank you for your generousness in talking to members of the delegation as we try to provide the Commission with the most complete picture possible of the significant deviations from the BRAC criteria.

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Questions for the Government Accountability Office
August 2005

1. The majority of the Navy's claimed recurring savings at Naval Submarine Base New London come from billet reductions. Since the COBRA model's baseline date of 9/30/2003, some of these claimed billet reductions have already been realized under the Chief of Navy Installations' cost savings initiative.

Questions for GAO:

- Did the Navy take credit for these CNI billet reductions in its BRAC savings estimate?
- If so, please quantify the amount included in the BRAC savings estimate.

2. Please confirm if the Navy COBRA model replaces the equivalent of 438 nuclear submarine maintenance contractors at Naval Submarine Base New London (~\$50 million per year) with 143 government employees at Kings Bay and Norfolk (~\$8 million per year).

According to the Connecticut team, in estimating DON-0033 costs and savings, the Navy:

1. cut the number of submarine maintenance personnel by two-thirds for the same workload; and
2. used the actual New London rate (\$57 per hour) in estimating recurring savings at New London, and the COBRA model default rate (\$29 per hour) for a civilian government employee to calculate recurring costs at Kings Bay and Norfolk. (As a reference point, Norfolk Naval Shipyard responded in its original data call with a need for 207 billets at a rate of \$87 per hour.)

Questions for GAO:

- Are the Navy's estimates and assumptions realistic and accurate with respect to these assumptions on submarine maintenance personnel under DON-0033.
- If not, are the Navy's stating savings overstated? By how much?

3. An information package recently submitted to the BRAC Commission cited a legal opinion of the Connecticut Attorney General Richard Blumenthal, showing a unique arrangement between Connecticut and the Navy in terms of environmental clean-up. The 1994 agreement appears to require the Navy to have completed the full environmental remediation of Naval Submarine Base New London before transferring the property over to another entity. Furthermore, Attorney General Blumenthal asserts that the Navy is required to turn over Submarine Base New London immediately to the state of Connecticut upon cessation of naval operations on that property.

Attorney General Blumenthal's opinion is on file with the BRAC Commission for GAO's review.

Questions for GAO:

- Did the Navy consider the potential impact of this agreement on its cost savings estimate for closing Naval Submarine Base New London?
- If not, how might this arrangement impact the cost projections of closing the base?

6. The State of Connecticut asserts that it would take years to complete an adequate study of radioactive waste contamination at the Naval Submarine Base New London in order to determine what cleanup will be necessary.

Questions for GAO:

- Did the Navy consider how a delay in the productive reuse of the sit, while the extent of necessary cleanup is determined and then performed, affect the economic impact of closing the base on surrounding communities?