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**DISAPPROVAL OF REMOVAL ACTION 123 -  
ANNUAL WORK PROCEDURES UPDATE FOR SAFE  
SHUTDOWN**

07-29-92

**USEPA/DOE-FN  
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LETTER**

R-022-707.1



ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

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JUL 29 1992

REPLY TO THE ATTENTION OF:

Mr. Jack R. Craig  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Disapproval of Removal Action 12-  
Annual Work Procedures Update  
for Safe Shutdown

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Removal Action 12-Annual Work Procedures Update for Safe Shutdown. The Update consists of standard operating procedures used during safe shutdown of the production facilities. However, this document requires revision in several areas.

U.S. EPA hereby disapproves the Work Plan pending incorporation of the enclosed comments.

Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "James A. Saric".

James A. Saric  
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO  
Pat Whitfield, U.S. DOE-HDQ  
Dennis Carr, WMCO

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AUG 12 1992

TECHNICAL REVIEW COMMENTS  
ANNUAL WORK PROCEDURES UPDATE  
SAFE SHUTDOWN REMOVAL ACTION NUMBER 12

**General Comment No. 1** The procedures update compiles Fernald Environmental Management Project (FEMP) policies and procedures relevant to the safe shutdown program; the document is not a work plan. However, the document should provide site personnel with sufficient information to conduct waste management tasks related to the safe shutdown program. The material covered includes (1) recycled equipment and supplies, (2) ordinary solid wastes, (3) Resource Conservation and Recovery Act (RCRA) hazardous wastes, (4) mixed wastes, and (5) radioactive wastes. The program interacts with other FEMP activities and documents, especially Removal Action Number 9, the Drum Management Plan, and the Operable Unit 3 remedial investigation and feasibility study (RI/FS). However, the procedures update inadequately addresses the following issues:

- General decontamination procedures for structures and equipment. These procedures are noted in the health and safety plan but are not included in the document.
- Packing, labelling, moving, storing, shipping, and manifest tracking.

These portions of the document need to be developed or revised to fully support the safe shutdown program.

**General Comment No. 2** The procedures update is missing numerous items listed in the index; these items should be included or adequately referenced. The missing items are listed below.

- FMPC-503, FMPC Spill Incident Reporting and Cleanup
- PP-0125, Emergency Management
- U.S. DOE Order 5820.2A, Radioactive Waste Management
- Amended Consent Decree
- SOP 1-C-101, Sampling Residual and Waste Materials
- SOP PO-S-06-001, Movement of Hazardous Waste
- SOP 20-C-101, Moving and Storing Nuclear Materials On Site at the FMPC
- SOP 20-C-904, General Nuclear Safety Requirements
- SOP 1-C-608, Storage of Radioactive Material
- SOP FMPC-0715, FMPC Work Request System
- SOP PP-FMPC-0719, Energy Control (Lockout and Tag out)
- SOP FMPC-508, Safety Analysis Documentation Program
- SSOP-0031, National Environmental Policy Act (NEPA) Document Process
- SOP FMPC-505, Radiation Control
- SOP FMPC-516, Control of Permits for Accomplishing Hazardous Work
- SOP PP-FMPC-5010, Management of Low-Level Waste (LLW)
- SOP 20-C-605, Establishment and Control of Satellite Accumulation Areas
- SOP 20-C-606, Hazardous Material Spill Cleanup
- SOP 20-C-700, Norclean Portable Vacuum Operation
- SOP 20-C-701, Operation of Spenser and Hoffman Portable Dust Collector
- SOP 2-C-601, Refinery Sump

- SOP 8-C-116, Filtering Refinery Thickener Underflow
- SOP 8-C-115, Filtration of Uranium Bearing Slops
- SOP PO-D-023, Shift Orders
- SOP 1-C-903, Plant 1 Nuclear Materials Inventory
- SOP 2-C-904, Refinery Nuclear Materials Inventory
- SOP 4-C-903, Plant 4 Nuclear Materials Inventory
- SOP 5-C-911, Plant 5 Nuclear Materials Inventory
- SOP 6-C-902, Plant 6 Nuclear Materials Inventory
- SOP 8-C-504, Plant 8 Nuclear Materials Inventory
- SOP 9-C-903, Plant 9 Nuclear Materials Inventory
- SOP 11-C-215, Pilot Plant Nuclear Materials Inventory
- SOP 20-C-709, Baghouse-Type Dust Collector Filter Removal/Replacement
- Task-Specific Health and Safety Plan for Decontamination of Various Areas of Existing Fixed or Removable Contamination, June 5, 1991
- SOP SP-P-35-010, Unrestricted Release of Materials from FMPC
- FMPC-303, Management of Government Property