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DISAPPROVAL OF REMOVAL ACTION 19 WORK PLAN

05/28/93

USEPA/DOE-FN

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LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

LOG 6-040186
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 JUN 1 2 18 PM '93

MAY 28 1993

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
 19 Work Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Removal Action 19: Plant 7 Dismantling Work Plan. This Work Plan provides a general description of the the various activities involved in dismantling Plant 7, but fails to provide detail concerning the disposition of materials generated during the Removal Action.

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

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

Sincerely,

James A. Saric
 Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
 Pat Whitfield, U.S. DOE-HDQ
 Nick Kaufman, FERMCO
 Jim Thiesing, FERMCO
 Paul Clay, FERMCO

(Shah)
 Action Response
 to DOE-1470-93
 (6105)

**TECHNICAL REVIEW COMMENTS ON "REMOVAL ACTION NO. 19:
PLANT 7 DISMANTLING, REMOVAL ACTION WORK PLAN, REV. No. 0"**

The Removal Action Work Plan, Rev. 0, for Removal Action No. 19: Plant 7 Dismantling was reviewed. General and specific comments on the work plan follow.

General Comments

1. The work plan provides a general description of the Plant 7 dismantling activities. However, control, collection, and sampling of wastewater generated from the decontamination of the Plant 7 materials are not fully described. The sampling and analytical procedures for Plant 7 wastewater and Plant 8 sump water should be described, or existing procedures should be referenced, if appropriate.
2. The sampling and analytical procedures to be used for waste characterization of Phase I wastes should be referenced.
3. The final disposition of containerized material generated from this removal action should be described. In particular, off-site shipment destinations and schedules should be included in the work plan.

Specific Comments

1. Section 6.4.1, Page 6-5, Item 2. The work plan should explain in more detail how particulate and water emissions beyond the work area will be controlled.
2. Section 6.4.2, Page 6-6, Item 1. The work plan should explain in more detail how decontamination water will be controlled and collected for treatment in the Plant 8 sump and FEMP biodenitrification system.

Comments on the "Plant 7 Dismantling Removal Action 19 Work Plan, Revision No. 0"

U.S. EPA Region 5 Radiation Section

May 1993

Commenting Organization: U.S. EPA, Radiation Section

Section #: 6.1 Page #: 6-1 Line #: 19 Code: C

Original Comment #: 1

Comment: Please provide additional information on the "sealing" of the foundation and slab, its purpose and intended result.

Response:

Action:

Commenting Organization: U.S. EPA, Radiation Section

Section #: 6.2 Page #: 6-2 Line #: 12 Code: C

Original Comment #: 2

Comment: Please explain the measures that will be in place to ensure that negative pressure is maintained within the building for the duration of the D&D process.

Response:

Action:

Commenting Organization: U.S. EPA, Radiation Section

Section #: 6.3 Page #: 6-3 Line #: 16 Code: M

Original Comment #: 3

Comment: It seems that the Phase Three activities required for the disassembly of Plant 7, which involve the removal of the buildings's exterior skin and structure, should not commence until Phase One and Phase Two activities are complete. It also seems that the cessation of negative pressure conditions and the removal and decontamination of the HEPA ventilation system, a Phase Two activity, should not commence until all other Phase One and Two activities are complete. For the purpose of contaminant control during this removal action, this work plan should ensure that the activities, and the order in which they are performed, minimize the possibility of contaminant release.

Response:

Action:

Commenting Organization: U.S. EPA, Radiation Section

Section #: 6.5.3 Page #: 6-7 Line #: 29 Code: M

Original Comment #: 4

Comment: The guidance documents used to determine the release of materials with surface contamination should be included as ARARs for this removal action, and listed in Table 6-4 of this document.

Response:

Action:

Commenting Organization: U.S. EPA, Radiation Section

Section #: 6.6

Table #: 6-4

Page #: 6-15

Code: M

Original Comment #: 5

Comment: The Plant 7 dismantling is considered a modification of a stationary source as defined by 40 CFR 61.15. As such, the effective dose equivalent shall be calculated using the source term derived using Appendix D to Part 61 as input to the computer models described in 40 CFR 61.93. The U.S. EPA Region 5 Radiation Section recommends the use of CAP-88PC for 40 CFR 61 Subpart H computer modeling purposes. In estimating radionuclide emissions as described in Appendix D to Part 61, the radionuclide activities (amounts in curies) present in Plant 7, the multiplication factors dependent upon the radionuclide states, and the emission adjustment factors used should be justified, documented, and attached to the results of the CAP-88 computer model run. The CAP-88 results and documentation supporting emission estimates should then be included as an appendix to this work plan, as well as support the annual radionuclide NESHAP Subpart H report submitted to U.S. EPA.

Response:

Action:

Commenting Organization: U.S. EPA, Radiation Section

Section #: 12

Page #: 12-1

Line #: 6

Code: C

Original Comment #: 6

Comment: Please provide two copies of the following document to the U.S. EPA Region 5 Radiation Section: United States Department of Energy, 1992. *Radiological Control Manual*. Washington: DOE/EH-0256T.

Response:

Action: