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**NEPA COVERAGE FOR RESTART OF URANYL NITRATE HEXAHYDRATE  
REMOVAL ACTION**

03/02/94

OP:94-0221

FERMCO

DOE-FN

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NEPA DOC.



Restoration Management Corporation

P.O. Box 398704 Cincinnati, Ohio 45239-8704 (513) 738-6200

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March 2, 1994

U. S. Department of Energy  
Fernald Environmental Management Project  
Letter No. C:OP:94-0221

Mr. J. Phil Hamric, Manager  
Department of Energy  
Fernald Field Office  
P. O. Box 398705  
Cincinnati, Ohio 45239-8705

Dear Mr. Hamric:

**CONTRACT DE-AC05-92OR21972, NEPA COVERAGE FOR RESTART OF URANYL NITRATE  
HEXAHYDRATE REMOVAL ACTION**

The purpose of this correspondence is to inform you of the proposed changes in the Uranyl Nitrate Hexahydrate (UNH) Removal Action and present FERMCO's recommendation for compliance with the National Environmental Policy Act (NEPA). As you may recall, Categorical Exclusion (CX) No. #358 was approved on January 15, 1992 by DOE-HQ addressing the entire scope of the Plant 2/3 UNH Removal Action (see attached). The CX outlined the process by which the UNH would be removed from the approximately 20 tanks in which it is currently stored in the Plant 2/3 area. In addition, the CX discussed the disposition of the material once the processing was completed.

In 1992, approximately 20,000 gallons of UNH were processed in a plant test. However, following a minor spill of dilute UNH, processing was suspended until further study was completed ensuring system integrity. As a result of a thorough evaluation of the system, several minor modifications have been proposed to ensure system safety. The key difference between the new processing plan and the old processing plan is that the UNH solutions will not be blended together prior to dilution and neutralization. This will expedite removal of the solutions from the storage tanks. In addition, modifications to the transfer piping network will be made to ensure there is only one source and one termination, thus removing the possibility of sending UNH to an unintended destination.

It is the position of FERMCO that while these modifications are very important from the standpoint of safety, they would result in very minor potential environmental impacts and are within the overall scope of CX No. 358. Therefore, it is our judgement that CX No. 358 still adequately covers all the aspects of this project and we are recommending that no additional NEPA documentation be prepared. Therefore, to complete NEPA review requirements, we are requesting the



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concurrence of Ed Skintik [DOE-FN, NEPA Compliance Officer (NCO)] with this recommendation.

If you have any question regarding this matter, our point of contact is Marc Nelson at 738-9470 or Eric Woods at 738-8661.

Sincerely,

A handwritten signature in black ink, appearing to read "J. A. Rasile".

J. A. Rasile  
Executive Vice President

Concurrence: Ed Skintik 9/8/94  
Ed Skintik, DOE-FN NCO

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