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**OPERATIONAL READINESS FOR DEWATERING, EXCAVATION,
EVALUATION PROJECT, PHASES 2, 3, AND 4**

01/06/95

C:CRU1:95-0001
FERMCO DOE-FN
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LETTER



Environmental Management Corporation

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

January 6, 1995

U. S. Department of Energy
Fernald Environmental Management Project
Letter No. C:CRU1:95-0001

Mr. David A. Lojek
Department of Energy
Fernald Area Office
P. O. Box 538705
Cincinnati, Ohio 45253-8705

Dear Mr. Lojek:

CONTRACT DE-AC24-920H21972, OPERATIONAL READINESS FOR DEWATERING, EXCAVATION, EVALUATION PROJECT, PHASES 2, 3, AND 4

The purpose of this letter is to document the decisions of Operable Unit 1 (OU1) to proceed with the Dewatering, Excavation, Evaluation Program (DEEP) Phases 2, 3, and 4 under a Readiness Assessment (RA) in accordance with FERMCO Operational Readiness Manual SM-0005.

DEEP is a Post Record of Decision Operable Unit 1 Treatability Study designed to evaluate waste dewatering and excavation techniques that will be implemented during remediation of the OU1 waste pits. Results of this evaluation will directly support OU1 Remedial Design.

The DEEP project consists of four phases: Geotechnical Testing, Wet Excavation, Dewatering, and Dry Excavation. In October 1994, Geotechnical Testing of soil borings and correlation of Standard Penetration Tests and Cone Penetrometer Tests (Phase 1) was completed. DEEP has now reached a point where field mobilization for the "Wet Excavation" phase (Phase 2) is in the planning stages. Phase 2 includes excavating a total of seven test areas and removing 15 cubic yards of waste from each of Waste Pits 1, 2, and 3 for future treatability investigations; the remaining waste will be returned to the pit of origin. Following the wet excavation phase, DEEP Phases 3 and 4 which consist, respectively, of dewatering and dry excavation will be performed.

Prior to initiating DEEP, FERMCO, in conjunction with DOE-FN, determined that DEEP was a "non-facility" as utilized in DOE Order 5480.23, Attachment I, Section 4.a.(3) which states:



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"Safety analyses are required for all DOE nuclear operations; however, the preparation and submission by contractors of a SAR for non-facility nuclear operations, such as environmental remediation programs or the transportation of nuclear materials, will be required only on a case-by-case basis. DOE may require SAR preparation and submittal for non-facility nuclear operations at its discretion, as this Order indicates in paragraph 8 'requirements.'"

The OUI Staff submits that the DEEP project is expressly defined as a "non-facility" and is not constrained to perform the requirements of DOE Order 5480.31 "Startup and Restart of Nuclear Facilities." The OUI Staff will pursue the following relevant safety activities for Phases 2, 3, and 4:

- Project Specific Plans, Project Specific Health and Safety Plans, Auditable Safety Records, DEEP Hazard Assessments, Readiness Assessments, Radiation Work Permits, and Radiation Worker training courses have been developed so that work can proceed safely under such conditions as will be encountered during DEEP field work.
- OUI Staff will require the availability and use of surfactant, tarpaulin, or other engineering control mechanisms, contained in the DEEP Work Plan, to keep the stockpiles intact.
- There are no credible accident initiators due to DEEP activities that could disperse this material in concentrations that would impact on-site or off-site populations. Material dispersion by an unlikely high wind event has been evaluated and found to be acceptable. The DEEP Work Plan identifies runoff and dispersion control measures to mitigate foreseeable problems.
- Stockpiles will remain open for a limited time and will be returned to the pit of origin when the excavation is closed. Only one excavation will be open at a time.



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Unless directed otherwise by DOE-FN, OUI Staff will proceed with Phases 2, 3, and 4 beginning January 19, 1995.

Sincerely,

Robert Fellman

Robert T. Fellman
 CRU1 Project Director

Concurrence: *Walter J. Quader*
 David A. Lojek, 1-11-95
 DOE CRU1 Project Director Date
Dep Assoc Director Safety/Assessment

RTF:WMB:JTH:gss
 Attachment

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