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**FERNALD CITIZENS TASK FORCE RECOMMENDATION TO ESTABLISH  
SITE PRIORITIES AND ACCELERATE REMEDIATION AT FERNALD  
(3 LETTERS SENT)**

04/11/95

**APPLEGATE      VARIOUS  
6  
LETTER**

# FERNALD CITIZENS TASK FORCE

A U.S. DEPARTMENT OF ENERGY SITE-SPECIFIC ADVISORY BOARD

Chair:

John S. Applegate

Members:

James Bierer  
Marvin Clawson  
Lisa Crawford  
Pam Dunn  
Dr. Constance Fox  
Guy Guckenberger  
Darryl Huff  
Jerry Monahan  
Tom B. Rentschler  
Robert Tabor  
Warren E. Strunk  
Thomas Wagner  
Dr. Gene Willeke

Alternates:

Russ Beckner  
Jackie Embry

Ex Officio:

J. Phillip Hamric  
Graham Mitchell  
Jim Saric

April 11, 1995

Hazel R. O'Leary  
Secretary of Energy  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585

Thomas P. Grumbly  
Assistant Secretary for Environmental  
Management  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585

**RE: Recommendation to Establish Site Priorities And Accelerate  
Remediation At Fernald**

Dear Secretary O'Leary and Assistant Secretary Grumbly:

Enclosed are the recommendations of the Fernald Citizens Task Force to Establish Site Priorities and Accelerate Remediation at Fernald. As you will see, we recommend that immediate action be taken to deal with special nuclear materials, legacy and mixed waste, and safe shutdown of the equipment and buildings on the site. Most important, the Task Force recommends conducting site-wide remediation on an accelerated schedule.

We appreciate the support the Department of Energy has provided to the Task Force and look forward to working together to implement these and all of our recommendations. We realize these recommendations require significant action on the part of the Department of Energy. Your attention and response by May 1, 1995, would greatly facilitate the preparation of our final report. I look forward to hearing from you.

Very truly yours,



John S. Applegate  
Chair

JSA:rmt  
enclosure

c: Task Force Members

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April 11, 1995

Valdas V. Adamkus  
Regional Administrator  
U.S. EPA - Region V  
77 West Jackson Boulevard  
Chicago, IL 60604

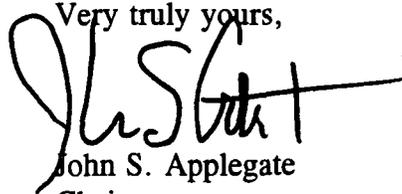
**RE: Recommendation to Establish Site Priorities And Accelerate Remediation At Fernald**

Dear Mr. Adamkus:

Enclosed are the recommendations of the Fernald Citizens Task Force to Establish Site Priorities and Accelerate Remediation at Fernald. As you will see, we recommend that immediate action be taken to deal with special nuclear materials, legacy and mixed waste, and safe shutdown of the equipment and buildings on the site. Most important, the Task Force recommends conducting site-wide remediation on an accelerated schedule.

We appreciate the support your agency has provided to the Task Force and look forward to working together to implement these recommendations.

Very truly yours,



John S. Applegate  
Chair

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April 11, 1995

Donald R. Schregardus  
Director  
Ohio Environmental Protection Agency  
P.O. Box 1049  
1800 Watermark Drive  
Columbus, OH 43266-0149

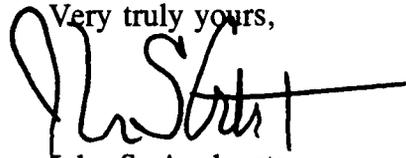
**RE: Recommendation to Establish Site Priorities And Accelerate Remediation At Fernald**

Dear Mr. Schregardus:

Enclosed are the recommendations of the Fernald Citizens Task Force to Establish Site Priorities and Accelerate Remediation at Fernald. As you will see, we recommend that immediate action be taken to deal with special nuclear materials, legacy and mixed waste, and safe shutdown of the equipment and buildings on the site. Most important, the Task Force recommends conducting site-wide remediation on an accelerated schedule.

We appreciate the support your agency has provided to the Task Force and look forward to working together to implement these recommendations.

Very truly yours,



John S. Applegate  
Chair

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enclosure

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# RECOMMENDATION TO ESTABLISH SITE PRIORITIES AND ACCELERATE REMEDiation AT FERNALD

The Fernald Citizens Task Force believes that the Fernald site is poised to make great progress in its remediation program, but only if allowed to operate in an efficient and streamlined manner. The most difficult and complex decisions regarding remediation have been clearly mapped out in accordance with the amended consent agreement and Records of Decision and will be in place within the next few months. The challenge now is to implement these decisions in a quick, safe, and cost-effective manner. The Fernald Citizens Task Force believes that this cannot be done under the remediation approach and operating rules that exist at Fernald today.

As part of our charge to recommend site priorities, we are calling for a fundamental shift in the approach to remedial operations at Fernald. DOE and its contractor must view the project as an environmental remediation operation, period. It is their job to implement the remediation decisions that have been made, quickly, safely, and cost-effectively, and then to leave. If Fernald is to be really treated like the remediation project it is—where work should be focused on a single goal and completed in a finite period of time—management at all levels must make an immediate and decisive change. Such an approach has several important consequences for remedial priorities, and focuses attention on obstacles to remediation apart from the existing operable units. Its cornerstone must be to eliminate big sources of non-productive expense: high overhead, storage of materials awaiting shipment, and cumbersome Department of Energy requirements. Specifically, we would like to see immediate and substantial steps taken to deal with the following:

**Special Nuclear Materials.** There are 17 million pounds of special nuclear (non-waste) materials throughout the Fernald site, which require a high level of expensive security, accounting, and safety procedures to maintain. This material is not going to stay at Fernald. This material does not belong at Fernald now, as Fernald is an environmental remediation project. Storage and maintenance of this material is being done at the expense of remediation operations. Appropriate storage facilities already exist within the DOE complex for materials such as these. The Secretary of Energy and the Assistant Secretary for Environmental Management must ensure that DOE make and implement the decision immediately to move these materials to such an appropriate location.

**Legacy Wastes.** There are approximately 70,000 drum equivalents of legacy waste sitting at Fernald awaiting shipment and another 12,000 drum equivalents of mixed waste awaiting treatment and shipment. Again, the storage and maintenance of

these wastes is diverting money from other much needed remediation activities. There is no mystery surrounding the location for disposal of most of these wastes, and their immediate shipment should be a top priority.

**Safe Shutdown.** When production ceased at the plant in the summer of 1989, it was conducted without taking the proper steps to bring the equipment and buildings to a safe configuration. As a result, millions are spent each year to maintain and provide security to buildings that should be closed and shuttered for subsequent demolition. Every effort must be made to expedite the safe shutdown of the Fernald facility to eliminate these burdensome overhead costs and hasten the shift in culture from operations to environmental remediation.

**Ongoing Maintenance Activities.** Another aspect of approaching Fernald as a remediation project is to discontinue the ongoing repair, maintenance, and improvement to on-site buildings and infrastructure, except where essential to remediation progress or worker safety.

**Overlapping Requirements.** Perhaps the most cumbersome of all requirements facing the remediation of the Fernald site are those internally imposed by DOE on itself. Significant time and money is wasted by requiring remediation activities to comply with DOE orders that are geared to the operation of highly complex and dangerous nuclear operations. Where these orders are superfluous or are redundant of other state and federal regulations, DOE can and should waive them. The Fernald Citizens Task Force recommends that the Fernald site be the prototype for streamlining these requirements and placing remediation first.

**Budgeting for the Long Haul.** Fernald holds a unique position among DOE's major remediation sites: its decisionmaking is nearly complete, needed technologies are in place, and its size is manageable. With the above reforms, a relatively modest up-front investment will yield a nearly complete remediation in one-half to one-third of the time projected in current reduced-budget scenarios. Under current budget constraints, remediation is estimated to take 25 years at a total escalated cost of \$5.7 billion. Without constraints, the same remediation could be conducted in seven years at a total escalated cost of \$2.7 billion. In addition to saving billions of dollars, the symbolic significance of getting a major facility "off the books" is incalculable. Our understanding of the options available to DOE in budgeting the Fernald project boil down to two basic choices: the potential for a big win by completing remediation in the seven year time-frame or a project constrained by annual funding caps that eventually costs twice as much and lasts three times as long. Dollar for dollar, there must be few opportunities in the DOE complex that offer a clearer choice or more attractive dividends.

There exists at this time at Fernald a window of opportunity to efficiently select and implement an accelerated remediation. DOE, its regulators, and its stakeholders must work together, with flexibility on all sides, to make these changes happen. It is time that DOE changed its legacy from a slow moving and expensive dinosaur, to a model of government/contractor efficiency. Given the tools and the reforms, Fernald can lead the way.