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R-022-208.2

**PROPOSAL FOR STREAMLING REPORTING REQUIREMENTS FOR
REMOVAL ACTION 12 SAFE SHUTDOWN**

05/30/96

DOE-0949-96
DOE-FN OEPA
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LETTER



Department of Energy

Ohio Field Office
Fernald Area Office
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



MAY 30 1996
DOE-0949-96

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Schneider:

PROPOSAL FOR STREAMLINING REPORTING REQUIREMENTS FOR REMOVAL ACTION 12, SAFE SHUTDOWN

References: Letter, T. Schneider to J. Reising, "Comments - Removal Action No. 12, Streamlining Reporting", dated April 17, 1996

Letter, J. Saric to J. Reising, "Removal Action No. 12: Safe Shutdown Reporting Requirements", date May 6, 1996

The Ohio Environmental Protection Agency (OEPA) expressed a concern in the above referenced letter that the proposed streamlining of reporting eliminates the requirement to obtain approval for remediation and disposal issues. This was not the intent of this request. Additionally, it was requested that, "Department of Energy (DOE) revise the request to specifically define instances where submission of changes is required or not." The U.S. Environmental Protection Agency (U.S. EPA) has concurred in the above referenced letter with the proposed streamlined reporting requirements. The following provides examples of changes which may or may not trigger agency approval in response to your request.

Almost all procedural changes impact how Safe Shutdown performs work, e.g., the type and usage of equipment that is used in a cleanout, or functional roles and responsibilities of the organization. These are not programmatic in nature and should not mandate submittal to the agencies. For example, if a procedural revision to a piece of equipment used for removing material (e.g., RADVAC 2000 wet vacuum system operation 20-C-106) is adopted, it would not be submitted for approval or acknowledgement. However, program changes will continue to be submitted for approval before any changes are incorporated. A proposed change away from performing energy isolation on facilities, for example, is a programmatic change and must be submitted for approval.

If you have any questions, please contact John Trygier at (513) 648-3154.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FN:Trygier

cc:

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