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**OU 1 PRELIMINARY DESIGN PACKAGES I, II**

**12/14/95**

**USEPA**

**DOE-FN**

**6**

**COMMENTS**



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

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J-063  
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DEC 14 1995

FILE  
REPLY TO THE ATTENTION OF:  
SRF-5J

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: OU 1 Preliminary  
Design Packages I, II

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Operable Unit (OU) 1 Remedial Design (RD) Preliminary Design Packages I and II. These preliminary design packages contained seven elements identified in the RD workplan.

Although the design packages adequately address the record of decision requirements and conform to generally accepted engineering practices, U.S. EPA has several comments.

Therefore, U.S. EPA disapproves the OU 1 preliminary design packages I and II. U.S. DOE must submit responses to comments addressing the attached issues, within thirty (30) days receipt of this letter.

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

Sincerely,

James A. Saric  
Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Jack Baublitz, U.S. DOE-HDQ  
Don Ofte, FERMCO  
Charles Little, FERMCO  
Terry Hagen, FERMCO  
Michael Yates, FERMCO

APR 11 1996  
FEDERAL FACILITIES SECTION  
RESPONSE TO  
2-0038  
(1004)

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ENCLOSURE

TECHNICAL REVIEW COMMENTS ON THE "OPERABLE UNIT 1 REMEDIAL DESIGN PRELIMINARY DESIGN PACKAGES I AND II, OCTOBER 1995"

GENERAL COMMENTS

Materials Management Plan

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: NA Page #: NA Line #: NA

Comment: The materials management plan provides a strategy for handling all of the material removed from operable unit 1 (OU1), both material that will be sent to an off-site disposal facility and to the on-site disposal cell. The handling of the material to be sent from OU1 to the on-site disposal cell will be coordinated along with the movement of material from other OUs that will be placed in the on-site disposal cell. Interim storage of OU1 material and the coordination of its transport with other OUs should be provided in the materials management plan.

Excavation Plan

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: NA Page #: NA Line #: NA

Comment: The excavation plan contains many assumptions, which at times are conflicting and confusing. Each time a design assumption is made on the basis of available data and a specific action is planned, a contingency is provided for by stating that if the planned action does not work, then other actions may become necessary and will be decided or designed later.

It is recognized that the overall excavation plan is complicated and all contingencies cannot be addressed; however, the plan appears to rely on many actions that will be designed later, and does not provide adequate alternatives. The main concern with this approach is that significant delays may occur in implementing the remedial action when new alternatives need to be designed.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 1-1 Page #: 1-1 Line #: 16 and 17

Comment: The text states that "equipment operations are not planned or anticipated to occur on pit wastes." It further states that "operations will be from on top of pit caps, on the pit bottoms..." These statements need further clarification. It does not seem possible that pits can be excavated without operations being conducted on top of or in the pit.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 1-2 Page #: 1-1 Line #: 25 through 38

Comment: The text states that the excavation to be conducted in Pits 1, 2, 4, and in the Burn Pit will be similar to that conducted in Pit 3. This statement appears to be contradictory because Pit 3 is a wet pit, which will most likely require hydraulic excavation. Pits 1, 2, 4, and the Burn Pit are dry pits and mechanical excavation is planned for the dry pits. This apparent contradiction should be resolved and the text revised accordingly.

Commenting Organization: U.S. EPA Commentor: Saric  
Conceptual Drawings Drawings No.: 91X-5900-G-00133 and  
91X-5900-G-0015A

Section #: NA Page #: NA Line #: NA

Comment: Activities for plan phases 1, 2, 3, and 4 are shown in Drawing 00133, which relates to Pits 1, 2, and 3. These phases contradict the activities for phases 1 and 2 shown in Drawing 0015A, which relates to Pits 5 and 6. This apparent contradiction should be resolved by correctly renumbering the phases.





