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3-408.2

PLANT 1 COMPLEX IMPLEMENTATION PLAN

12/07/95

USEPA

DOE-FN

6

COMMENTS



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

2040

J-0591

DEC 11 1995

REPLY TO THE ATTENTION OF:

DEC 07 1995

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

SRF-5J

RE: Plant 1 Complex
Implementation Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the draft Plant 1 Complex-phase I Implementation Plan (IP). The IP includes project-specific design and field activities planned for decontamination and dismantlement of the above-grade portions of eight (8) components located in Operable Unit 3.

Although the IP conforms with generally accepted engineering practices, U.S. EPA has several comments.

Therefore, U.S. EPA disapproves the Plant 1 Complex IP pending receipt of adequate responses to the attached comments, and their incorporation into the IP. U.S. DOE must submit a responses to comments and a revised IP within thirty (30) days receipt of this letter.

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

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
- Terry Hagen, FERMCO
- Charles Little, FERMCO
- Michael Yates, FERMCO

Handwritten notes:
SIGNED
DATE
ACTION - RESPONSE
TO FERMCO
(1992)

Original Specific Comment #: 11

Comment: The text states that above-grade decontamination and dismantlement of the Plant 1 Complex - Phase I will be accomplished by the following six remedial tasks:

- Task I - Preparatory Action - Inventory Removal
- Task II - Preparatory Action - Safe Shutdown
- Task III - Hazardous Waste Management Unit
- Task IV - Asbestos Removal
- Task V - Surface Decontamination
- Task VI - Above-Grade Dismantlement

The remediation of each of the eight components of the Plant 1 - Complex Phase I is discussed in Sections 3.1 through 3.8; however, for each of the components, all six of the tasks are not discussed. Therefore, the text should be revised to state if a task is not applicable for a specific component and should provide an explanation for its exclusion.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 4.0

Page #: 57

Line #: NA

Original Specific Comment #: 12

Comment: The text presents the Figure 4-2 Remediation Schedule.

The figure indicates that the remedial action (RA) report will be submitted on March 4, 1998 when the Plant 1 Complex-Phase I is complete. The figure does not indicate that any interim reporting will be provided prior to the conclusion of remediation activities. The text should be revised to clarify and provide information regarding plans for interim reporting on the Plant 1 Complex - Phase I remediation.