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COMMENTS - OU4 SILO SUPERSTRUCTURE DESIGN FOR THE FRVP

06/10/96

OEPA DOE-FN
4
COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

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June 10, 1996

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
COMMENTS--OU4 SILO
SUPERSTRUCTURE DESIGN
FOR THE FRVP

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has received DOE's Operable Unit 4 Silo Superstructure Design for the FRVP document submitted on May 2, 1996. Attached are Ohio EPA comments.

If you have any questions, please contact Kelly Kaletsky (513-285-6454) or me.

Sincerely,

Kelly Kaletsky for
Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

- cc: Jim Saric, U.S. EPA
- Terry Hagen, FERMCO
- Ruth Vandergrift, ODH
- Mike Proffitt, DD&GW
- Sharon McLellan, PRC
- Manager, TPSS/DERR,CO
- Dave Ward, GeoTrans

*(a.k.gundov(6))
partial
action response
to DOE-0856-96
(9682)*

COMMENTS ON OPERABLE UNIT 4 - SILO SUPERSTRUCTURE FOR THE FRVP

Assembly and Rigging Concept Plan

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: n/a Line #: n/a Code: C
 Original Comment #:
 Comment: Will the construction of the Silo Superstructure effect the real-time monitoring of the silo headspace and the real-time monitoring of radon concentrations at the perimeter of the K-65 exclusion area? Real-time monitoring of the ambient concentrations of radon around the silos should be in place prior to Silo Superstructure construction activities. This will enable quick response to any significant breaches of the silo.
 Response:
 Action:

- 2) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: n/a Line #: n/a Code: C
 Original Comment #:
 Comment: The plan does not emphasize the importance of avoiding accidental contact with silos or the silo domes. The subcontractor should be required to submit a plan to minimize the possibility of inadvertent contact of the silos with equipment (construction or rigging).
 Response:
 Action:

- 3) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.3 Pg #: 1-2 Line #: n/a Code: C
 Original Comment #:
 Comment: How will the determination be made regarding the use of 1 3/4" or 1 1/4" steel plating for shielding in the equipment room and vestibule floor areas? Is there a mechanism in place that will determine which thickness will be used in a particular area?
 Response:
 Action:

- 4) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2 Pg #: 3-1 Line #: n/a Code: C
 Original Comment #:
 Comment: Will relocation of the utilities in any way interrupt service to the Vitrification Pilot Plant? If so, how will this interruption be handled?
 Response:
 Action:

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2 Pg #: 3-3 Line #: n/a Code: C

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Original Comment #:

Comment: If movement of radiological monitors is necessary for the construction of the Silo Superstructure, the new locations should be reported to the regulatory agencies. The new locations should be operational prior to work beginning on the Silo Superstructure.

Response:

Action:

- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2 Pg #: 3-3 Line #: n/a Code: C

Original Comment #:

Comment: If some of the existing monitoring wells may be abandoned, it is important to note that every attempt should be made to leave several wells open in the vicinity of the silos to assure that increased liquids in the silos are not leaking into and overflowing the underground collection sump.

Response:

Action:

- 7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2 Pg #: 3-4 Line #: n/a Code: C

Original Comment #:

Comment: The information presented in Table 3-1 tends to point toward the use of Option #3 as having the least number of interferences. How much weight will this information have in choosing the preferred option?

Response:

Action:

Specifications

- 8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 02270 Pg #: 2 of 3 Line #: n/a Code: C

Original Comment #:

Comment: The plan states that the "subcontractor shall inspect sediment control measures periodically..." The term periodically should be specifically defined, i.e. daily or weekly, as well as after rainfalls of 0.25" or greater.

Response:

Action:

Soil Management For FRVP Silo Superstructure Construction

- 9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: n/a Line #: n/a Code: C

Original Comment #:

Comment: During construction activities, how will be determination between Category I and Category II soils be performed? How long will Category II soils be stockpiled?

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Response:
Action: