



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

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LOG # 1047
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FILE: 6446.4
REPLY TO THE ATTENTION OF:
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MAY 22 1997

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

SRF-5J

RE: Thorium/Plant 9
Implementation Plan
RTC

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) Response to Comments (RTC) package for the Thorium/Plant 9 implementation plan.

Overall, U.S. DOE has not adequately addressed U.S. EPA's previous comments. U.S. DOE continues to reference the Operable Unit 3 Integrated Remedial Design/Remedial Action work Plan rather than describe the specific application of those guidelines in the implementation plan.

Therefore, U.S. EPA disapproves U.S. DOE's RTC for the Thorium/Plant 9 implementation plan. U.S. DOE must submit responses to comments adequately addressing U.S. EPA's attached comments within thirty (30) day receipt of this letter.

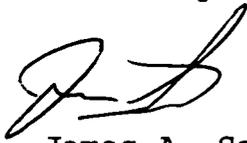
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partial
action response
to DOE-0776-97
(10404)*

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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
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Charles Little, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

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TECHNICAL REVIEW COMMENTS ON "OPERABLE UNIT 3 INTEGRATED REMEDIAL ACTION, THORIUM/PLANT 9 COMPLEX IMPLEMENTATION PLAN, COMMENT RESPONSE DOCUMENT"

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: Not applicable(NA) Page #: NA Line #: NA
 DOE Response #: NA (Original General Comment #: NA)
 Comment #: 1

Comment: The U.S. Department of Energy (DOE) responses to U.S. Environmental Protection Agency (U.S. EPA) comments do not follow the appropriate comment response format. For example, each DOE response includes U.S. EPA's comment and DOE's response but does not separately identify the specific DOE action taken to address the comment. The standard comment response format includes a separate DOE action item description that concisely summarizes the DOE action taken and assists in identifying and evaluating DOE's revised text in the document under review. In addition, DOE's current page and line references in the responses are inconsistent, and the responses are not numbered. DOE's responses to comments should be revised to follow the standard format.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: NA Page #: NA Line #: NA
 DOE Response #: NA (Original General Comment #: NA)
 Comment #: 2

Comment: Several of U.S. EPA's original comments request that DOE provide additional detail in the implementation plan instead of referencing general guidelines in the "Operable Unit (OU) 3 Integrated Remedial Design/Remedial Action Work Plan (IWP)." However, DOE's responses to U.S. EPA comments continue to inappropriately reference the OU3 IWP. The OU3 IWP provides general guidelines related to decontamination and dismantlement (D&D) activities at OU3 complexes, but the purpose of the implementation plan is to provide the specific details of how the guidelines will be applied to Thorium/Plant 9 Complex D&D activities. As requested in U.S. EPA's original comments, DOE should revise the implementation plan to provide these details and should revise its responses accordingly.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 2.3.4 Page #: NA Line #: NA
 DOE Response #: NA (Original General Comment #: 1)
 Comment #: 3

Comment: The original general comment requests that DOE provide additional information on the planned interim storage locations for Thorium/Plant 9 Complex materials. DOE's response refers to "other" storage pads or slabs that may be used for interim storage. DOE should revise the response to specifically identify the "other" potential interim storage locations.

