



Department of Energy

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



MAR 10 1998

DOE-0557-98

Mr. Gene Jablonowski, Remedial Project Manager
 U.S. Environmental Protection Agency
 Region V, SRF-5J
 77 West Jackson Boulevard
 Chicago, Illinois 60604-3590

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

Dear Mr. Jablonowski and Mr. Schneider:

AMENDMENT TO OPERABLE UNIT 3 INTEGRATED REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN REGULATORY MILESTONES

The purpose of this letter is to submit to the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) proposed revisions to the regulatory milestones originally published in the Operable Unit 3 (OU3) Remedial Design/Remedial Action (RD/RA) Work Plan in May 1997. Pursuant to Section XVIII (A)(1)(2) of the Amended Consent Agreement (ACA), enclosed with this letter are amended pages of the OU3 Integrated RD/RA Work Plan (in yellow), which contain the revised milestones (Table 6-1) and the revised OU3 Base Remediation Schedule (Figure 6-1). The enclosed amendment to Table 6-1 of the OU3 Integrated RD/RA Work Plan incorporates revised implementation plan submittal dates for each of the OU3 Decontamination and Dismantlement (D&D) complexes. It should be noted that no other site-wide remedial priorities have been significantly altered at this time relative to implementation schedules. DOE is requesting these schedule extensions based on Section XVIII (B)(5) of the Amended Consent Agreement (ACA) as related to "good cause" that allows better alignment of the Implementation Plan submittal schedules with the actual schedules for initiation of D&D.

The existing implementation plan submittal dates, when compared to the revised D&D dates contained in the OU3 Base Remediation Schedule (Figure 6-1, enclosed), no longer follow the remedial design submittal strategy identified in the OU3 Integrated RD/RA Work Plan. That strategy states that the individual D&D implementation plans should be submitted to the regulators approximately three months prior to issuance of a "Notice to Proceed" (NTP) to the subcontractor. The submittals would then occur far enough along in the design process to provide adequate detail while allowing for a sufficient review and approval cycle

for the regulators. If the existing implementation plan submittal dates were applied to the revised D&D schedule, implementation plans for future D&D projects would have to be submitted by as much as two years prior to field work (refer to schedule enclosure for comparison between old and new dates). This does not allow for timely review by either you or the public. In addition, this would make likely the need for revisions at the time of implementation. In order to sequence the submittal of implementation plans to coincide with three months prior to the revised OU3 Base Remediation Schedule for projected NTP dates, it was necessary to make a number of revisions to the regulatory milestones as shown in Table 6-1. The current D&D schedules reflect discussions related to prioritization of this program between DOE, your Agencies and our stakeholders as compared to other site-wide priorities. The specific changes in implementation schedule reflect known funding levels and most current, overall project cost estimates.

The regulatory milestones, which represent the submittal of draft implementation plans for each of the OU3 D&D complexes, were revised following verbal discussions between DOE and the regulatory agencies at a meeting held in early February 1998. Per request of the regulatory agencies at that meeting, formal approval of the revised OU3 regulatory milestones would be contingent on their review of written documentation which includes the revised OU3 milestone dates, the justification for the revisions, and a summary of the DOE commitments made in relation to the future sequencing of D&D at the Fernald Environmental Management Project (FEMP).

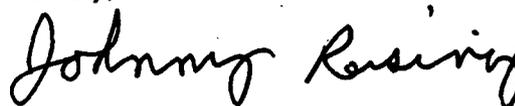
Due to public stakeholder and regulator preference, the regulatory milestone for the submittal of the Pilot Plant Complex implementation plan (i.e., January 17, 2000) was not revised. This allows for the possibility of giving the Pilot Plant Complex D&D schedule primary consideration in the event that sufficient uncommitted funds become available to accomplish those activities.

The re-sequencing of these D&D activities will allow better utilization of target funding levels and accommodates new initiatives such as the advance waste retrieval of the material from silos 1 and 2.

In recognition of the regulators' focus on efficiency enhancements to minimize remediation schedule impacts, Fluor Daniel Fernald (FDF) has also committed (see enclosed letter) to continue improving the efficiency and effectiveness of all FEMP activities to accelerate remediation. More specifically, both DOE and FDF will continue to aggressively seek cost savings from all FEMP activities and apply process improvements by incorporating lessons learned in an effort to accelerate FEMP remediation.

If you or your staff have any questions, please contact John Trygler at (513) 648-3154.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Reising

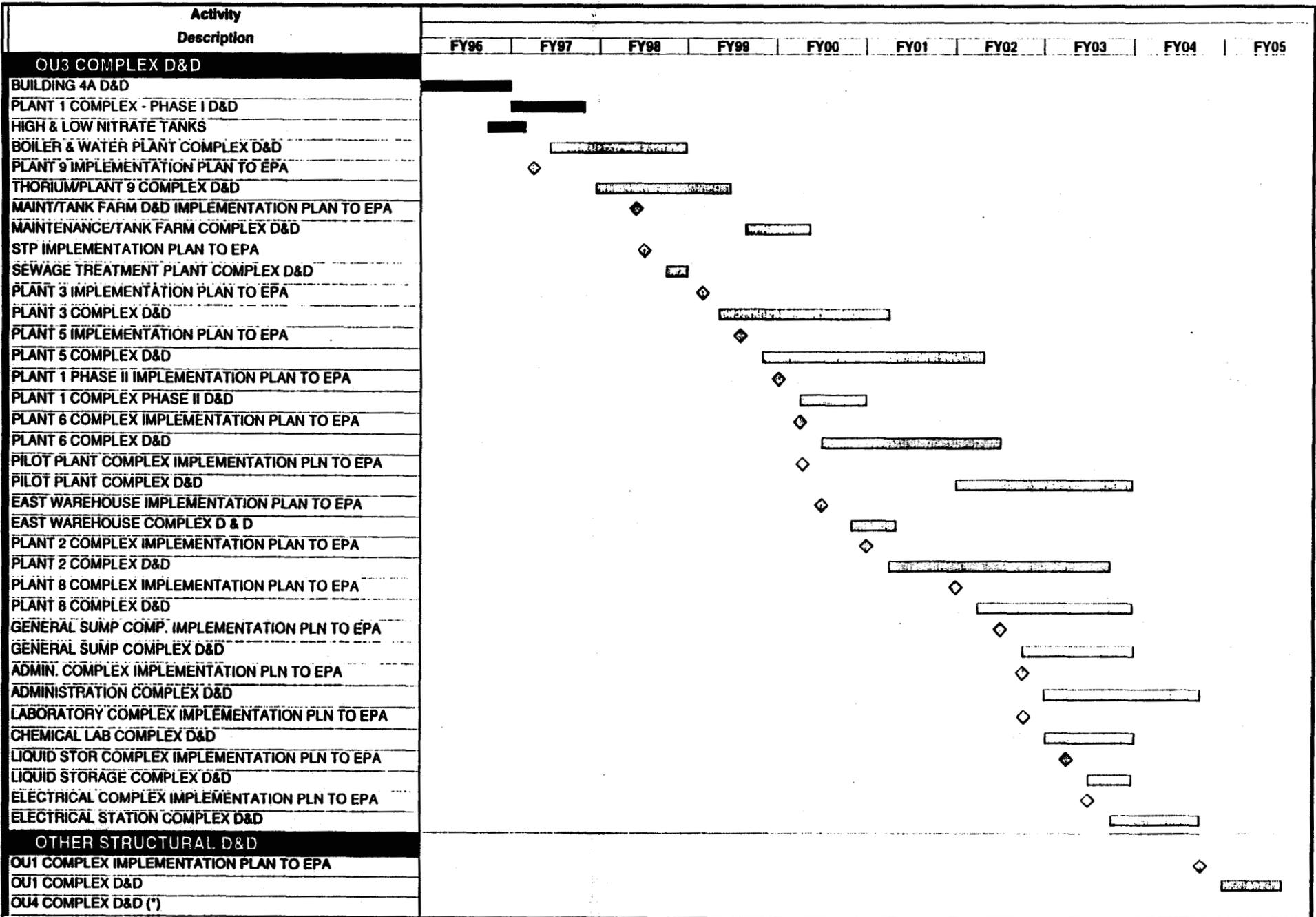
Enclosures (4): As Stated

cc w/encs:

N. Hallein, EM-42/CLOV
L. Parsons, DOE-OH
J. Trygler, DOE-FEMP
J. Saric, USEPA-V, SRF-5J
R. Beaumier, TPSS/DERR, OEPA-Columbus
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Barker, Tetra Tech
T. Hagen, FDF/65-2
L. Hampshire, FDF/52-3
J. Harmon, FDF/90
S. K. Holliday, FDF/69
D. Paine, FDF/52-4
AR Coordinator, FDF/78

cc w/o encs:

A. Tanner, DOE-FEMP
R. Heck, FDF/2
S. Hinnefeld, FDF/2
EDC, FDF/52-7



Project Start	01OCT94	[Bar]	Early Bar
Project Finish	31MAY96	[Bar]	Progress Bar
Date Date	01OCT94		
Run Date	26FEB96		

LVL3

REVISED FIGURE 6-1
 PROPOSED FY-99 REPLAN SCHEDULE
 FOR OPERABLE UNIT 3 DISMANTLEMENT

Sheet 1 of 1

Date	Revision	Checked	Approved

TABLE 6-1 OU3 Remedial Design Regulatory Milestones

Complex	Implementation Plan Submittal Dates
Building 4A	19 Sep 94 ^(a)
Plant 1 Complex - Phase I	3 Nov 95 ^(a)
High and Low Nitrate Tanks	20 Feb 96 ^(a)
Boiler Plant/Water Plant Complex	12 Sep 96 ^(a)
Thorium/Plant 9 Complex	2 Jan 97 ^(a)
Tank Farm Complex	5 Mar 98 ^(b)
Maintenance Complex	5 Mar 98 ^(b)
Sewage Treatment Plant Complex	2 Apr 98
Plant 3 Complex	2 Dec 98
Plant 5 Complex	2 May 99
Plant 1 Complex - Phase II	6 Oct 99
Plant 6 Complex	2 Jan 00
Pilot Plant Complex	17 Jan 00
East Warehouse Complex	2 Apr 00
Plant 2 Complex	1 Oct 00
Plant 8 Complex	3 Oct 01
General Sump Complex	4 Apr 02
Administration Complex	4 Jul 02
Laboratory Complex	7 Jul 02
Liquid Storage Complex	1 Jan 03
Electrical Complex	3 Apr 03
OU1 Complex	3 Jul 04
OU4 Complex	(c)

- (a) actual submittal date
 (b) Maintenance and Tank Farm Complexes are planned to be remediated as a combined project (i.e., Maintenance/Tank Farm Complex), resulting in the submittal of a single, joint implementation plan.
 (c) to be determined; submittal date pending resolution of OU4 milestone rescheduling effort.



P.O. Box 538704 Cincinnati, Ohio 45253-8704 (513) 648-3000

February 6, 1998

Fernald Environmental Management Project
Letter No. C:OOTP:98-0066

Mr. Jack R. Craig, Director
Department of Energy
Fernald Environmental Management Project
P. O. Box 538705
Cincinnati, Ohio 45253-8705

Dear Mr. Craig:

CONTRACT DE-AC24-92OR21972, PRODUCTIVITY IMPROVEMENTS

Fluor Daniel Fernald is committed to achieving up to a 5 percent efficiency improvement per year in overall site cleanup activities. This commitment is based on our experience in project execution during 1996, 1997, and 1998 during which we were able to identify process improvements that yielded approximately \$20,000,000 in additional work being done than what was planned.

FDF, with your concurrence, has installed an innovative workforce enhancement reward process that solely rewards the employees for their ideas that result in "hard" dollar savings. This process was modified from our parent company Fluor Corporation where it has been used on over 350 projects worldwide with great success.

Examples of our process improvements include:

	(Approx. \$)
- Deletion of horizontal wells initially required for groundwater extraction	3,700m
- Process improvements to accelerate thorium overpacking	400m
- Credit card cost savings initiatives	2,000m
- Lease reduction due to consolidations	2,900m
- Locomotive cost reduction/schedule acceleration	1,000m
- Paving vs gravel maintenance	350m
- Safe shutdown schedule improvement	1,000m
- Elimination of bentonite treatability	450m
- Air monitoring cost avoidance	1,900m



Mr. Jack R. Craig
Letter No. C:OOTP:98-0066
Page 2

As we have begun to enhance our work processes for actual "in-the-field" remediation, we have found many lessons learned which have improved our performance. Our Enhanced Work Planning (EWP) program encourages total employee involvement is also adding to our optimized performance. Together DOE and FDF can develop a process for accounting for these improvements to monitor our progress toward meeting this commitment.

I am confident that our team will continue to provide additional process improvement with each year's experience as we continue to work on an accelerated cleanup of the Fernald site.

Sincerely,

A handwritten signature in black ink, appearing to read "John Bradburne".

John Bradburne
President

JCB:RPH:rjm

c: L. E. Parsons, DOE Contract Specialist
Dave Capelle, MS65-2
Bob Heck, MS 2
Mike Kuntz, MS51
Johnny Reising, MS45
File Record Storage Copy 102.1