



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

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REPLY TO THE ATTENTION OF: SRF-5J

MAR 18 1998

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

Subject: Amendment to Operable Unit 3 Integrated Remedial Design/Remedial Action Work Plan Regulatory Milestones

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the above-referenced letter as part of its oversight activities for the Fernald Environmental Management Project (FEMP). The letter (extension request), dated March 10, 1998, proposes revisions to the regulatory milestones originally published in the Operable Unit 3 (OU3) Remedial Design/Remedial Action (RD/RA) Work Plan in May 1997.

The extension request proposes revisions to the submittal dates for the OU3 implementation plans to allow better utilization of target funding levels and accommodate new initiatives such as the advanced waste retrieval of silo 1 and 2 materials. The extension request states that the revised submittal dates should also allow more timely information to be provided in the implementation plans and improve their correlation with decontamination and dismantlement (D&D) activities. The revised submittal dates reflect the United States Department of Energy's (U.S. DOE) latest schedule replan and the commitment to complete all D&D activities by calendar year 2006.

The extension request states that both U.S. DOE and Fluor Daniel Fernald (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. The extension request also provides FDF's commitment (via enclosed letter) to achieve *up to a 5 percent* efficiency improvement per year in overall site cleanup activities. However, during verbal discussions between DOE and the regulatory agencies on February 4, 1998, U.S. DOE and FDF explicitly committed to efficiency improvements of *at least 5 percent* per year in overall site activities. In accordance with the verbal discussions, U.S. EPA expects efficiency improvements of at least 5 percent per year in overall site activities. U.S. DOE and FDF should not constrain themselves as they seek cost savings in the effort to accelerate FEMP remediation. U.S. DOE must report such cost savings to U.S. EPA at the end of each fiscal year.

Therefore, U.S. EPA concurs with the revised OU3 implementation plan submittal dates. These dates are enforceable milestones under the 1991 Amended Consent Agreement. Any future request for schedule extensions will be highly scrutinized.

Please contact me at (312) 886-4591 if you have any questions.

Sincerely,



Gene Jablonowski
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO