



Department of Energy

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MAY 11 1999

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

DOE-0697-99

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

Dear Mr. Saric and Mr. Schneider:

**REQUEST TO DELETE OPERATING PROCEDURES FORM AND INCORPORATE THE IN-SITU
GAMMA SPECTROMETRY ADDENDUM INTO THE SITE-WIDE COMPREHENSIVE
ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT QUALITY
ASSURANCE PROJECT PLAN**

This letter is a result of technical discussions during the April 13, 1999, Real Time Technical Workgroup Meeting involving Department of Energy, Fernald Environmental Management Project (DOE-FEMP), Department of Energy, Environmental Measurements Laboratory (DOE-EML), U.S. Environmental Protection Agency (U.S. EPA), Ohio Environmental Protection Agency (OEPA), and Fluor Daniel Fernald, Inc. (FDF) pertaining to the In-Situ Gamma Spectrometry Addendum to the Site-Wide CERCLA Quality Assurance Project Plan (SCQ). This addendum to the SCQ is currently composed of three sections:

- 1) Appendix H to the SCQ;
- 2) The Real Time Instrumentation Measurement Program Quality Assurance (QA) Plan; and,
- 3) The In-Situ Gamma Spectrometry Quality Control (QC) Procedure (ADM-16).

Items 2 and 3 above are FDF lower tier operating procedures. DOE-FEMP requests approval to delete them from the SCQ Addendum for the following reasons:

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- The current structure of the SCQ Addendum was envisioned by all parties as interim, with its relevant contents being merged into the SCQ proper with the maturity of the Real Time Program. After a year of field experience, the time is appropriate to have a single SCQ. Therefore, FDF recommends that the QA plan and QC procedure be deleted and that Appendix H of the SCQ Addendum becomes Appendix H of the SCQ.
- Appendix H was designed to be consistent in format with sections and appendices in the SCQ proper, which deals with laboratory analyses. In this regard, Appendix H of the SCQ Addendum contains a tabulation of QC criteria and requirements analogous to Appendix G which contains the same type of information for laboratory analyses. Therefore, removal of the QA plan and QC procedure will not create gaps in the technical information and performance specifications in the SCQ Appendix H, which are needed to produce in-situ measurement results of known quality.
- Inclusion of the QA plan and QC procedure in the SCQ Addendum presents problems for the FDF Real Time Instrumentation Measurement Program. Both of these documents are operating procedures and are linked closely to all other operating procedures of the FDF Real Time Instrumentation Measurement Program. Changes to real time operating procedures must be reflected in concomitant changes to the QA plan and QC procedure. In turn, each change to these two documents, no matter how minor, theoretically requires approval from the Agencies because of their inclusion in the SCQ Addendum. This adds an undue administrative burden to both DOE and Agencies, and delays implementation of improvements in the Real Time Program based upon lessons learned from operating experience.
- Revisions to the QA plan and QC procedure will be documented in the SCQ by changes to Appendix H as applicable. Agency approval will be sought for those changes via standard SCQ Document Change Notices (DCN) or via periodic SCQ revisions. Similarly, it may be necessary to add more information (above and beyond elements of the QA plan and QC procedure) to Appendix H in the future as the Real Time Program continues to evolve. Such information will also be added via DCNs or periodic SCQ revisions.
- Incorporation of the SCQ Addendum into the SCQ, with the same format as other SCQ appendices, makes the SCQ more manageable and easier to maintain from a document control/management perspective. Instead of two documents (the SCQ and the SCQ Addendum, which contains Appendix H to the SCQ), only one document will have to be controlled.

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As indicated above, this request was discussed in the April 13, 1999, Real Time Technical Workgroup Meeting. The U.S. EPA and OEPA representatives who attended that meeting believed the request to be reasonable and recommended that it be formalized in an approval request letter.

If you have any questions, please contact Mr. Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

cc:

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bcc:
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