



## Department of Energy

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JAN 11 2000

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Remedial Project Manager  
U.S. Environmental Protection Agency  
Region V, SRF-5J  
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DOE-0288-00

Mr. Thomas A. Schneider, Project Manager  
Ohio Environmental Protection Agency  
Office of Federal Facilities Oversight  
Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402-2911

Dear Mr. Jablonowski and Mr. Schneider:

### **EXTENSION REQUEST FOR MAINTENANCE/TANK FARM COMPLEX DECONTAMINATION AND DISMANTLEMENT**

Reference: U.S. Environmental Protection Agency, Region V, & U.S. Department of Energy Consent Agreement as Amended under Comprehensive Environmental Response, Compensation, and Liability Act Sections 120 and 106 (a), Docket #V-W-90-C-057; September 20, 1991

The current regulatory milestone of March 9, 2000 for completion of the Maintenance/Tank Farm Complex Decontamination and Dismantlement (D&D) includes Buildings 64 and 65. As you know, Buildings 64 and 65 have been, and continue to be, used for the storage and repackaging of thorium wastes. Repackaging of thorium wastes in these buildings was scheduled for completion in August 1999. Over 95% of the repackaging activities were complete in July 1999.

On July 24, 1999, a fire occurred during the venting of thorium containers suspected of containing hydrogen-generating wastes. As a result of the fire, all activities associated with repackaging and shipment of thorium wastes at Buildings 64 and 65 were discontinued pending an investigation of the cause of the fire. This investigation was completed on September 30, 1999. As a result of this investigation, a number of actions

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are being implemented to ensure safe handling of these wastes. This includes revision of safety analyses, operational controls, and procedures for these activities. Once these actions are completed (procedures, training, etc.), the Fernald Environmental Management Project (FEMP) will complete venting of containers with hydrogen-generating wastes (primarily metals), repackaging of the thorium wastes, placing the thorium metal in a safe storage configuration at another location on-site, and shipping non-metal thorium waste streams to the Nevada Test Site (NTS). These activities will be complete by August 30, 2000, with final D&D of Buildings 64 and 65 complete by September 30, 2001.

As was briefed to you on December 14, 1999, the project baseline and current operational plans call for the On-Site Disposal Facility (OSDF) to be inactive from approximately September 2000 to July 2001. Due to the nature of Buildings 64 and 65 debris contamination (i.e. thorium), DOE believes the most sound manner of handling this waste stream is to "direct place" the debris into the OSDF at the time of D&D. This will avoid double handling of the thorium contaminated debris and the need for enhanced thorium contaminated environmental controls associated with staging debris on the pad for an extended period of time.

Based on these paths forward, DOE request an extension to the existing regulatory milestone from March 9, 2000 to September 30, 2001 for the completion of the Maintenance/Tank Farm Complex D&D, inclusive of Buildings 64 and 65. DOE believes that good cause, as defined in Section XVIII C.2(c) of the Amended Consent Agreement (see Reference), exists for an extension of the milestone to September 30, 2001. Specifically, Building 65 has the necessary controls to manage the hazards and prevent spread of contamination (e.g. High-Efficiency Particulate Air (HEPA) filter system, negative pressure) in the event of a release from one of the containers. Continued use of Building 64 for staging for repackaging and shipment would minimize double handling, and thereby, minimize dose to workers. After movement of the repackaged materials is complete (by August 2000), D&D of the building will be scheduled to allow "direct placement" of resulting debris into the OSDF. This proposed extension would allow the most environmentally sound and worker protective management of the thorium metals and debris resulting from the D&D of Buildings 64 and 65 without impacting any other aspect of the FEMP's remedial schedule, including subsequent D&D and soil excavation. DOE also proposes submittal of an interim Project Completion Report for the Maintenance/Tank Farm Complex at this time, with an exclusion for Buildings 64 and 65; after completion of Buildings 64 and 65 D&D, an addendum would be submitted for the total project completion.

In concert with the Plant 1 Pad Consolidation Plan (reference DOE letter DOE-0782-99, dated June 1, 1999), DOE also request the re-assignment of Building 20A, the Pump Station and Power Center, from the scope of the Maintenance/Tank Farm Complex to the

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scope of the Plant 1 Complex – Phase II. The Power Center currently supplies Plant 1 Pad operations with electrical power and would remain a necessity until the shipment of all legacy wastes and nuclear materials on the Plant 1 Pad has been completed. Please note that the Power Center is within the Area 3B Soil Excavation Area and, therefore, this re-assignment would not impact soil excavation schedules.

If you have any questions regarding this matter, please contact John Trygier at (513) 648-3154.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Trygier

cc:

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