



8617 FCAB UPDATE

Week of April 2, 2001

(Last update was dated March 16, 2001)

MEETING SCHEDULE

DOE Cleanup Progress Briefing
Tuesday, April 10, 2001, 6:30 p.m.

Services Building Conference Room

Stewardship Committee Meeting (*date change*)

Wednesday, April 11, 2001, 6:30 p.m.

Services Building Conference Room

Full FCAB Meeting (*date & time change*)

Thursday, April 19, 2001, 6:00 p.m.

Services Building Conference Room

ATTACHMENTS

- FCAB Recommendation #2001-01 for Rebaselining
- Draft Minutes of February 5, 2001 Full CAB Meeting
- Summary of March 1, 2001 Stewardship Committee Meeting
- Draft Minutes of March 10, 2001 Full CAB Meeting
- Agendas for April Stewardship Committee and Full FCAB meetings
- CAT Report #20
- Fernald Site Occurrence Report
- Letter, dated March 15, 2001, to FCAB from Michael Donnelley, CDC, on the Fernald Health Effects Subcommittee (see News & Announcements below)
- Letter, dated March 19, 2001, to Rep. Doc Hastings, Chairman, House Nuclear Cleanup Caucus, from the Environmental Business Action Coalition, addressing contractor concerns with funding shortfall.
- Letter, dated March 30, 2001, from DOE-FEMP responding to OEPA and USF&WS concerns about ongoing natural resource restoration at Fernald site.
- Newsclips and Press Releases
 - Fernald Money May Run Short
 - Inspector General Criticizes Fernald Uranium Sale
 - White House Announces Eight New Nominations
 - Labor Secretary Asks for Shift in Agency Responsibility for Nuclear Workers Compensation
 - Washington State Attorney General May Take Feds to Court Over Hanford Cleanup
 - EPA Grows Solutions to Clean-Up Problems at Toxic Sites
- Oak Ridge SSAB Advocate, March 2001

NEWS and ANNOUNCEMENTS

- **CALENDAR UPDATE** – Please note that the April Stewardship Committee meeting is Wednesday, April 11, at 6:30 p.m. and the Full CAB meeting is Thursday, April 19, at 6:00 p.m.
- **FERNALD HEALTH EFFECTS SUBCOMMITTEE UPDATE** – We just received the Final Evaluation Report on the Health Effects Subcommittee Advisory Process, submitted by COSMOS Corporation to the Centers for Disease Control and Prevention. The report exceeds 40 pages. A summary and copies of the report will be in the next Update and/or at the April full CAB meeting.

FOR FURTHER INFORMATION

Please contact Doug Sarno or Lois Yasutis, Phoenix Environmental

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March 30, 2001

Chair
James C. Bierer

Vice Chair
Thomas E. Wagner

Members
Sandy Butterfield
Marvin W. Clawson
Lisa Crawford
Stephen P. Depoe
Louis Doll
Pamela Dunn
Jane Harper
Robert G. Tabor
Fawn Thompson
Gene E. Willeke

Ex Officio Members
L. French Bell
Gene Jablonowski
Stephen H. McCracken
Graham Mitchell

Support Staff
Phoenix Environmental
Douglas J. Sarno
Crystal M. Sarno
703-971-0030
703-971-0006 Fax

Stephen H. McCracken
Director, Fernald Site Office
United States Department of Energy
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. McCracken:

Enclosed please find the Fernald Citizens Advisory Board (FCAB) Recommendation #2001-01, entitled "Recommendations for Rebaselining of the Fernald Environmental Management Project." We appreciate the efforts of many individuals in providing us with the information needed to understand the rebaselining challenges.

The FCAB has a continuing strong concern over the far-reaching implications of Fernald's budget shortfall and rebaselining needs. We look forward to seeing the results of the rebaseline effort and working with DOE to make continued remediation progress at the site.

Sincerely,

James C. Bierer
Chair

Enclosure

cc: Martha Crosland, EM-11
Susan Brechbill, DOE-Ohio Field Office
SSAB Chairs

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RECOMMENDATION #2001-01

RECOMMENDATIONS FOR REBASELINING OF THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

March 30, 2001

2 pages

Presented to: Stephen H. McCracken, U.S. DOE, Fernald Site Office

Source of Recommendation:

- Full Board
 Stewardship Committee

Type of Recommendation:

- Initial
 Follow-on to Recommendation

Response Requested by: N/A

OVERRIDING ISSUES

While the Fernald Citizens Advisory Board (FCAB) is willing to work with DOE to ensure the most efficient and timely remediation of the Fernald site, we have not lost sight of the fact that the current funding shortfall is a direct result of insufficient funding requests from the Department of Energy to Congress. The FCAB and the Fernald community have worked very closely with DOE to create a model for how cooperation can be used to promote good decision-making. This has not been without great compromise on the part of the Fernald community. A major result of these efforts was to receive the Defense Closure Site designation from Congress, which was to ensure the completion of Fernald by 2006. DOE by its actions has thwarted efforts by the Fernald community and the will of Congress to bring this about. The FCAB will continue to work to ensure this situation is somehow remedied. With that in mind, the FCAB recommends that DOE take the following actions in developing a new baseline for the Fernald site:

- DOE must continue to ensure the focus on a safe work environment for all Fernald projects .
- DOE should consider the total project in making its decisions and setting priorities.
- DOE must ensure that sufficient flexibility is built into all planning aspects in order to deal with the high level of risk that is inherent to all remediation activities, particularly with regard to the Silos.
- DOE must aggressively pursue increased efficiencies throughout all aspects of the Fernald site to ensure that the maximum amount of funding possible is being spent on projects resulting in real environmental progress.
- DOE should keep working with the Critical Analysis Team (CAT) to ensure independent review and advice on all aspects of the Silos project.

SPECIFIC ISSUES BY OPERABLE UNIT

- AWR**
- DOE should move aggressively to resolve subcontracting issues quickly.
 - DOE should proceed as soon as possible to complete the work of the AWR in the most beneficial way for the site, whether by the current subcontractor or by Fluor Fernald.
 - DOE should pursue, wherever possible, proven approaches in all technical aspects of the project, particularly in the removal of waste from the Silos.
- Silos 1 & 2**
- DOE should move forward to develop a straightforward means of treatment relying on proven technologies whenever possible.
- Silo 3**
- DOE should move forward with Silo 3 aggressively.
 - DOE should use simple proven technologies to the maximum extent possible in both the removal and treatment of Silo 3 material.
 - DOE should synergize transport and disposal to the maximum extent possible with the waste pits project.
- Waste Pits**
- DOE should proceed as quickly as possible to complete the waste pits project.
- D&D**
- DOE should use forward funding as a means to accelerate this work only if it proves to be beneficial to overall site completion.
- Natural Resources**
- DOE should continue to make progress on natural resource restoration to the maximum extent practical given the likely slowdown in soils work.
 - DOE should continue to pursue cost-effective projects to promote the restoration and final configuration of certified areas on the site.
- Soils & OSDF**
- While not pleased with the need to reprioritize work schedules, the FCAB recognizes the value of suspending soils and OSDF work in order to serve the purpose of achieving overall site remediation in a timely and cost-effective manner.
 - It is essential that DOE and Fluor take necessary measures to retain key staff, ensure that all essential institutional knowledge is maintained, and coordinate work for the efficient restart of these projects.
- Legacy Waste**
- DOE should pursue every possible opportunity to get all legacy waste and special nuclear materials off site as soon as possible.
 - DOE should aggressively pursue non-EM funding sources for the management of these materials.
- Groundwater**
- DOE should ensure continuity of all water removal and treatment operations and compliance with all water-related permits.



FULL BOARD MEETING

Services Building Conference Room

Monday, February 5, 2001

MINUTES – DRAFT

The Fernald Citizens Advisory Board (the “Board”) met from 6:00 p.m. until 8:45 p.m. on Monday, February 5, 2001, at the Fernald Site Services Building in Hamilton, Ohio. The meeting was reported in the Federal Register and open to the public. Fluor Fernald, Inc. (“Fluor”) advertised the meeting in a special postcard mailing to key local stakeholders.

Members Present

French Bell
 Jim Bierer
 Sandy Butterfield
 Marvin Clawson
 Lisa Crawford
 Steve Depoe
 Lou Doll
 Pam Dunn
 Jane Harper
 Gene Jablonowski
 Steve McCracken
 Graham Mitchell
 Robert Tabor
 Gene Willeke

Members Absent

Fawn Thompson
 Thomas Wagner (excused)

Designated Federal Official

Gary Stegner

Phoenix Environmental Staff

Douglas Sarno

Fluor Fernald Staff

Tisha Patton

Also present at the meeting were approximately 30 members of the general public representing Fluor, the Department of Energy (DOE), the United States Environmental Protection Agency (USEPA), the Ohio Environmental Protection Agency (OEPA), and the local community.

1. Call to Order

Jim Bierer called the meeting to order at 6:00 p.m.

2. Chair's Remarks and Ex-Officio Announcements

The Board and DOE have each sent a letter to the Centers for Disease Control in Atlanta requesting the status of the Fernald Health Effects Subcommittee. There has been no response yet.

The Critical Analysis Team Report #19 on Accelerated Waste Retrieval design documentation will be distributed in the next update.

Jim Bierer contacted the office of Hamilton County Commissioner, Todd Portune, to request his involvement with the Board. Jim will follow up with the Commissioner.

Jim Bierer, Doug Sarno, Tisha Patton, and Gary Stegner will attend the SSAB Chairs Meeting on February 7-10, 2001.

3. Presentation and Discussion of Rebaselining Scenarios

The rebaseline is due from Fluor Fernald to DOE by May 20, 2001. During its evaluation, DOE will consider all comments and seek independent validation of costs. Fluor developed numerous rebaselining scenarios, but only four remain under serious consideration. They are identified herein and on materials handed out at the meeting as Scenario Nos. 2, 3, 5, and 6. The Board needs to send its comments to Fluor as soon as possible.

Doug Sarno explained the scenarios in detail. Materials (attached) were distributed for each scenario describing key elements, cleanup timelines, and risk management issues. Mr. Sarno led the Board in a review of the scenario materials and discussed their risks and ramifications.

Scenarios 3 and 6 are considered the most viable (2 and 5 are variations) and represent the most likely path forward. Scenario 3 keeps all activities going, but none at optimum levels. Scenario 6 suspends the soils and On Site Disposal Facility (OSDF) projects for about four years, accelerates Demolition and Decontamination (D&D) and waste pits, and then comes back to OSDF and soils in later years.

Short-term Risk Differences. There does not appear to be a substantial difference among the scenarios. Each equally prioritizes Accelerated Waste Retrieval which addresses the most notable risk on site—the deteriorating silos. Each also continues to work on groundwater, waste in inventory, and monitoring with the same priority. Scenario 6 reduces key risks quicker and anticipates a faster overall completion.

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Environmental Safety of OSDF Interim Closure. Closing the OSDF requires placing interim covers on two open cells, one of which is 50% full and the other 10% full. Attendees compared interim cover alternatives for the OSDF.

EPA expressed concern that interim closure of the OSDF would (1) compromise its long-term effectiveness, (2) make the site more susceptible to government budget cuts, and (3) violate the Consent Agreement and CERCLA. EPA is also concerned about how long it would take to bring the OSDF back to an efficient level of operation after interim closure.

Board members expressed concern that unexpected amounts of runoff or leachate could diminish the effectiveness of the liner and piping system at the OSDF. Fluor representative, J.D. Chiou, explained that they would continue to monitor the facility, especially after storms, and take care of any problems.

Impact Should Unexpected Costs or Schedule Problems Occur on Silos. Ohio EPA suggested that projects that are working well, like AWR and OSDF, be sequenced ahead of the problem-plagued, high-cost silos. It was also suggested that Fluor wait for information from AWR before proceeding with the Silos 1 and 2 design. Fluor's silos team does not see this as necessary. The silos project is on the critical path, any delay will delay the total completion of the site.

Combining Silo 3 Treatment with Silos 1 and 2. The Board wanted to know why Silo 3's timeline is equal to that of Silos 1 and 2. Fluor responded that since there is no current contractor for Silo 3, it made an assumption that the same treatment technology and facility would handle all three silos. DOE and Fluor are still working on a new plan for Silo 3.

Missed Milestones. Milestones will be missed no matter which scenario is used. According to EPA, missing milestones because OSDF and D&D are shut down completely for several years, as in Scenario 6, is the bigger issue.

Workforce Management/Retention of Key Staff. Under each scenario there is a workforce reduction of approximately 20%. Scenario 6 requires an additional reduction of 150 full time employees because of the OSDF and soils shutdown. Any manpower reduction will be carried out in such a way that key staff remain to re-design, re-staff and re-start OSDF and soils. Fluor has established an employee retention program to provide financial incentives for at least the Project Manager, Engineering Lead, and Construction Lead. Other key impacted employees will be fit into openings as possible. The overall effort will be managed by a Staff Optimization Team.

Continued Availability of Off Site Disposal. There are concerns about the continued availability of Envirocare and NTS in later project years. Although the issue affects both scenarios to some degree, Scenario 3 has the latest shipping dates. At present, both sites are still accepting shipments.

Under Scenario 3, cleanup of nuclear materials is extended to 2003 as opposed to 2002 under Scenario 6. Regardless of scenario, the overall plan for Fernald is to cleanup higher level waste sooner than lower level waste.

Ability to Reopen OSDF. Some Board members are concerned that shutting down the OSDF would make it vulnerable to funding cuts or political issues. No evidence exists suggesting that this might occur. Doug Sarno explained that temporary covers are such that they could never be considered a long-term solution.

Legality and Feasibility of Alternative Methods of Financing. Scenario 6 proposes contractor forward funding of some projects. The project contractor would front the initial costs and then be reimbursed when funds become available. The approach is purely speculative at this time. First Fluor would need to get permission from DOE, then work out contractual and financial issues. If forward funding is possible, it could be used under any scenario.

None of the scenarios affect existing subcontracts.

The Board asked for a breakdown of the total cost of each scenario by year by project to review at its next meeting. Between Scenario 3 and 6 there is a difference in total costs of approximately 19%. The Board also asked that a member of the Critical Analysis Team attend the next meeting to answer any technical questions.

4. Public Comment

Jim Bierer opened the floor to public comment. There was none.

5. Next Meeting

The next meeting of the full Board will be March 10, 2001. At that meeting the Board will decide on its recommendations regarding the scenarios.

6. Adjournment

Jim Bierer adjourned the meeting at 8:45 p.m.

COMPARISON OF REBASELINING SCENARIOS

Description of Key Elements	Scenario 2	Scenario 3	Scenario 5	Scenario 6
21 23	<ul style="list-style-type: none"> Shut down D&D in 2002 after Plant 5/6, resume 2004 Shut down Soils in 2001, resume in 2005 Shut down OSDF in 2001, resume in 2005 	<ul style="list-style-type: none"> D&D continues complex by complex Soils continues at 60,000 cubic yards per year Slow down waste pits Slow down waste management 	<ul style="list-style-type: none"> Contractor finances D&D through 2005 Shut down Soils in 2001, resume in 2005 Shut down OSDF in 2001, resume in 2005 	<ul style="list-style-type: none"> Contractor finances D&D through 2006 Shut down Soils in 2001, resume in 2004 Shut down OSDF in 2001, resume in 2004
Completion Date	December 31, 2008	September 31, 2011	December 31, 2008	December 31, 2009
Total Costs	\$2,216 million	\$2,786 million	\$2,252 million	\$2,331 million
Labor Costs (% of total)	\$541 million 24% of total	\$894 million 32% of total	\$541 million 24% of total	\$664 million 28% of total
Risk Considerations	<ul style="list-style-type: none"> Major risk elements completed earlier Needs effective interim closure of OSDF 	<ul style="list-style-type: none"> Key risk elements take longer to reduce (silos and waste pits) 	<ul style="list-style-type: none"> Major risk elements completed earlier Needs effective interim closure of OSDF 	<ul style="list-style-type: none"> Major risk elements completed earlier Needs effective interim closure of OSDF
Missed Regulatory Milestones	<ul style="list-style-type: none"> D&D Building 64/65 D&D Warehouse Outyear implementation plans (6) Certification report for Area 9, Phase 1 4 IRDP submittals 	<ul style="list-style-type: none"> D&D Building 64/65 D&D Warehouse Outyear implementation plans (6) Certification report for Area 9, Phase 1 4 IRDP submittals 	<ul style="list-style-type: none"> D&D Building 64/65 D&D Warehouse Outyear implementation plans (6) Certification report for Area 9, Phase 1 Areas 3A, 4A excavations 4 IRDP submittals Waste Pits D&D 	<ul style="list-style-type: none"> D&D Building 64/65 D&D Warehouse Outyear implementation plans (6) Certification report for Area 9, Phase 1 Areas 3A, 4A excavations 4 IRDP submittals
Issues Identified	<ul style="list-style-type: none"> Environmental safety of OSDF interim closure Impact of unexpected cost/schedule problems on silos Retention of key staff on soils and OSDF Continued availability of off site disposal Ability to reopen OSDF 	<ul style="list-style-type: none"> Expensive, slow, and inefficient 	<ul style="list-style-type: none"> Environmental safety of OSDF interim closure Impact of unexpected cost/schedule problems on silos Retention of key staff on soils and OSDF Continued availability of off site disposal Ability to reopen OSDF Legality of contractor financing 	<ul style="list-style-type: none"> Environmental safety of OSDF interim closure Impact of unexpected cost/schedule problems on silos Retention of key staff on soils and OSDF Continued availability of off site disposal Ability to reopen OSDF Legality of contractor financing



Rebaselining Discussion Topics, February 5, 2001

Short-term Risk Differences Among Alternatives

- There have been questions regarding the different levels of short-term risk among the alternatives. There does not appear to be a substantial difference among the alternatives. Each equally prioritizes the Alternative Waste Retrieval project which addresses the most notable risk on site of the deteriorating silos. Each also continues to work on groundwater, waste in inventory, and monitoring with the same priority.
- Scenario 6 reduces key risks quicker and has a faster overall completion.

Environmental Safety of OSDF Interim Closure

- Scenarios 2, 5, and 6 require shutting down the OSDF for three to four years to accelerate work on other projects.
- Requires that an interim cover be placed on open cells 2 (~ 50% full) and 3 (~ 10 % full).
- Cell 1 is full and will receive a final cover.
- Four options have been identified (see table).
- The OSDF design firm, Geosyntec, concurred that the interim cover options are acceptable for their given design duration provided that they are properly designed, installed, and maintained.

Impact Should Unexpected Cost/Schedule Problems Occur on Silos

- Concern has been raised that focusing on silos ahead of soils could result in additional expenditure of dollars should silos incur unexpected problems.
- It has also been suggested that Fluor wait to get materials information from AWR before proceeding with Silos 1 and 2 design. Silos team does not see this as necessary.
- Average budget for silos in years 2002 through 2007 is \$50 million (17% of total).
- Silos project is on the critical path, any delay will delay the total completion of the site.

Combining Silo 3 Treatment with Silos 1 and 2

- Current plan is to use same treatment technology and facility for all three silos.
- Suggestion has been made to pursue the possibility of shipping of Silo 3 with minimal treatment.

Retention of Key Staff on Soils and OSDF

- Scenarios 2, 5, and 6 require shutting down the soils and OSDF for three to four years to accelerate work on other projects.
- Concern has been raised regarding the loss of key staff and the cost and the potential difficulty of restarting these projects.
- Fluor has established an employee retention program to provide financial incentives for at least the Project Manager, Engineering Lead, and Construction Lead. Other key impacted employees will be fit into openings as possible. The overall effort will be managed by a Staff Optimization Team.

Continued Availability of Off Site Disposal

- Concern has been raised about the continued availability of Envirocare and NTS in later project years.
- Affects all scenarios to some degree, Scenario 3 has the latest shipping dates.
- No specific obstacles are present at this time.

Ability to Reopen OSDF

- Concern has been raised about the possibility of further reduced funding or other political issues in later years which would prevent the OSDF from being reopened.
- No evidence exists suggesting that this might occur.

Legality and Feasibility of Contractor Financing

- Current contracting rules prevent contractor funding of D&D as proposed. This approach is purely speculative at this time.
- Requires contractor willingness to spend their own money at risk.
- Cost and schedule impacts of not using contractor funding are minimal.

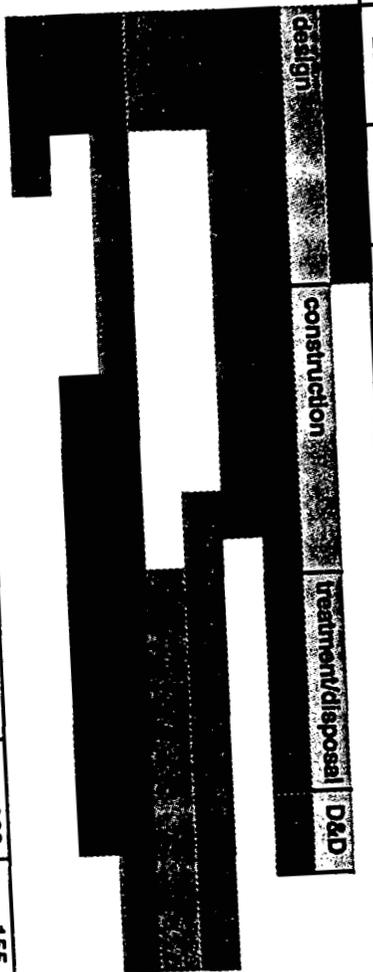




Comparison of Rebaselining Scenarios

Timeline for Scenario 2

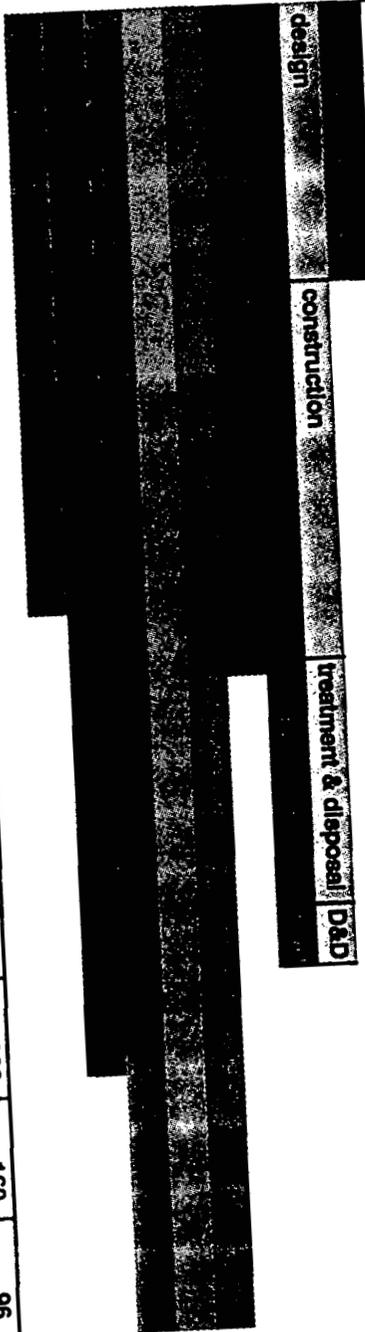
	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	TOTALS
AWR												
Silos 1/2												
Silo 3												
Waste Pits												
OSDF												
Soils												
Groundwater												
D&D												
Nuclear Materials												
Annual Costs (millions)	\$289	291	291	281	273	288	262	155	76			\$2,216
Annual Labor Costs (millions)	\$119	89	69	58	73	64	44	21	35			\$541
Annual Labor FTE	1,935	1,412	1,368	1,151	1,458	1,278	873	413	69			9,957



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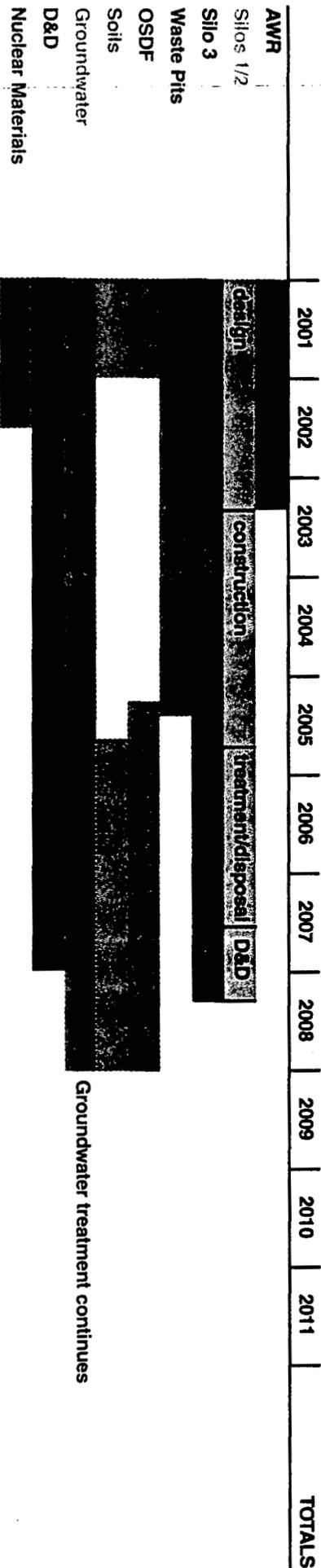
Timeline for Scenario 3

	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	TOTALS
AWR												
Silos 1/2												
Silo 3												
Waste Pits												
OSDF												
Soils												
Groundwater												
D&D												
Nuclear Materials												
Annual Costs (millions)	\$289	291	291	291	291	291	291	273	226	160	96	\$2,786
Annual Labor Costs (millions)	\$118	98	88	89	105	88	93	81	64	42	28	\$694
Annual Labor FTE	1,916	1,559	1,399	1,379	1,597	1,287	1,293	1,107	805	527	345	13,214



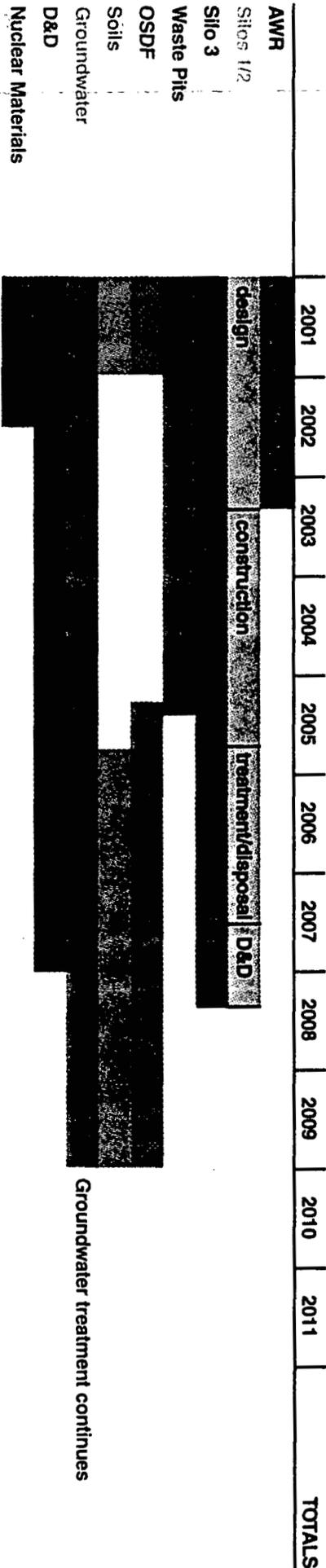


Comparison of Rebaselining Scenarios Timeline for Scenario 5



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Timeline for Scenario 6



Category	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	TOTALS
AWR												
Silos 1/2												
Silo 3												
Waste Pits												
OSDF												
Soils												
Groundwater												
D&D												
Nuclear Materials												
Annual Costs (millions)	\$289	291	291	291	291	291	291	178	84	36		\$2,331
Annual Labor Costs (millions)	\$119	90	87	73	97	81	59	31	19	8		\$664
Annual Labor FTE	1,940	1,432	1,389	1,133	1,410	1,179	814	427	239	98		10,061

COMPARISON OF OSDF INTERIM COVER OPTIONS

	Approach 1 1 Year Seasonal Cover	Approach 2 4 Year Enhanced Seasonal Cover	Approach 3 4+ Year Geomembrane Cover	Approach 4 Final Cover
Description 1100	<ul style="list-style-type: none"> • 3 feet of material tops clay • Track and roll to stabilize • Grade slopes and channels • Silt fences • Crusting agent • Inspections and maintenance • Condition reports as part of IEMP 	<ul style="list-style-type: none"> • 3 feet of material tops clay • Track and roll to stabilize • Grade slopes and channels • Silt fences • Heavy duty crusting agent • Inspections and maintenance • Resume material placement at end of interim closure period • Condition reports as part of IEMP 	<ul style="list-style-type: none"> • 3 feet of material tops clay • Track and roll to stabilize • Grade slopes and channels • Geomembrane cover • Resume material placement at end of interim closure period • Active storm water management • Condition reports as part of IEMP 	<ul style="list-style-type: none"> • Add material to fill • Slope sides • Place final cover • Covered cells cannot be reopened
Expected Life	<ul style="list-style-type: none"> • Up to 1 year • Reapply crusting agent every 6 mos. 	<ul style="list-style-type: none"> • Up to 4 years • Reapply crusting agent every 6 mos to 1 year 	4 years or more	Final
Time to Implement	One week to install	One week to install	4-6 weeks to install each cover	6-8 months per cell plus time to complete material placement
Cost	\$50,000 per cell per application	\$100,000 per cell per year	\$1 million per cell	\$4-5 million per cell
Advantages	N/A	<ul style="list-style-type: none"> • Easier installation • Allows reopening 	<ul style="list-style-type: none"> • Cover could last 4+ years • Less maintenance than seasonal covers 	Provides final configuration
Disadvantages	<ul style="list-style-type: none"> • Not suitable for interim cover needs 	<ul style="list-style-type: none"> • Requires active storm water management • Requires active monitoring and maintenance 	<ul style="list-style-type: none"> • Involves special design, surface grading and installation • Requires specific quality controls • Requires active monitoring and maintenance 	<ul style="list-style-type: none"> • Must build new cells • Requires excavation of much more materials • Covered cells cannot be reopened • Adjacent cells require fill to create suitable slopes • Significant funding and schedule impacts

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MEETING SUMMARY

Date: March 1, 2001

Topics:

- Proposed Monitoring Technologies for OSDF
- Natural Resource Trustee Issues
- Native American Reinterments
- Concepts and Criteria for Trails

Attendees:

Fernald Citizens Advisory Board

Jim Bierer
Sandy Butterfield
Steve Depoe
Pam Dunn
Bob Tabor
Tom Wagner

Phoenix Environmental

Doug Sarno

U.S. Department of Energy

Pete Yerace
Johnny Reising
Gary Stegner
Ed Skintik

Ohio Environmental Protection Agency

Tom Schneider

Fluor Fernald

Tisha Patton
John Nomar
Joseph Schomaker
Marty Prochesky

FRESH

Edwa Yocum
Carol Schroer
Vicky Dastillung

Crosby Twp. Historical Society

Jim Innis



Proposed Monitoring Technologies for OSDF

The Fernald Stewardship Innovative Technologies Team is looking at innovative monitoring technologies for the On Site Disposal Facility (OSDF). At a meeting on January 29, 2001, the team recommended specific technologies for enhanced monitoring of the OSDF's cap and cover system. Their recommendations include:

Ground Penetrating Radar (GPR). Reflectors will be placed at varying intervals within the cap/cover system. The reflectors possess a very different density than the cap/cover materials and can be detected by the GPR equipment. The location of the reflectors can be measured over time to determine whether there has been any movement of the cap/cover materials.

Pressure Transducers/Thermal Couples. These sensors will be placed in the drainage layer of the cover system. The drainage layer is intended to divert water off the disposal facility cover. The pressure transducers will measure pressure build up in the drainage layer. Pressure increases would indicate that water is not flowing through the drainage layer as designed. The Thermal Couples measure temperature in the drainage layer. The drainage layer is designed not to freeze, as freezing would inhibit flow through the drainage layer.

Remote Sensing. Refers to a number of types of aerial imaging that could be performed. At a minimum, annual aerial photographs will be taken; however, more advanced imagery could reveal a number of problems including drainage issues, erosion, and vegetative stress.

Web Camera. To increase surveillance on the disposal facility, a high-resolution camera(s) can observe the facility 24 hours a day. Access to the images would be made available over the internet.

Natural Resource Trustee Issues Related to Rebaselining

In a letter to DOE, Ohio EPA (OEPA) and the U.S. Fish & Wildlife Service (USFWS) expressed concern that recent actions by DOE suggest a lack of commitment to restoration plans negotiated by the Natural Resource Trustees (NRT). They have requested a response from DOE by April 1, 2001.

At the meeting, OEPA representative, Tom Schneider, stated that none of the rebaseline scenarios, especially Scenario #6, adequately address natural resource restoration. Under Scenario #6, which requires stopping soils remediation and interim closure of the On Site Disposal Facility (OSDF), natural resource restoration would be delayed until after 2004. Such a delay would negatively impact the scope of current restoration work, and could lead to more costly site closure and duplication of effort in the process. At present, over half

MEETING SUMMARY (continued)

of the site is certified and can be restored at reasonable cost. In response, Johnny Reising iterated DOE's commitment to natural resource restoration work and to continuing dialogue with the Natural Resources Trustees. The Committee asked DOE to provide more detail on how funding for natural resource activities will be impacted by the rebaselining of the site.

Native American Reinterments

DOE has contacted the Shawnee, Miami, Delaware, Absentee, and Wyandotte tribal nations requesting input on their interest in the repatriation process at Fernald. To date, only the Eastern Shawnee and Miami tribes have responded. The Eastern Shawnee will interact with DOE through a Repatriation Committee in accordance with their customs. The Miami tribe is eager to move forward on repatriation. DOE is waiting on word from the Delaware, Absentee, Wyandotte, and other Shawnee tribes. In addition, several western tribes and some Ohio Native American alliances and councils have expressed interest in the site.

In accordance with its policy on tribal relations DOE and its contractors are required to develop separate contracts with each tribal government. DOE plans to hold a meeting of interested tribes in Tulsa, Oklahoma, to obtain input for contracting and developing a work plan. Repatriations may begin as soon as late 2001/early 2002.

The League of Catholic Churches and Procter & Gamble were discussed as two possibilities for corporate funding of the reinterments. DOE will also seek advice from the Ohio Historic Preservation Office and the Ohio Historical Society on funding.

Conceptual Plans and Criteria for Trails

Using the conceptual use maps developed at the Future of Fernald Workshop, the committee identified key criteria for walking trails. The criteria are in keeping with the ecological and education emphasis envisioned for the restored site.

- Provide trails that access key ecological areas and enhance the educational experience.
- Provide access to areas used for environmental monitoring.
- Set aside areas for research that are not readily accessible to the public.
- Discourage access to sensitive areas by bikes, rollerblades, joggers (e.g., no looping trails).
- Provide unpaved (mulch) trails in the most environmentally sensitive areas.
- Provide overlooks to environmentally sensitive areas.
- Provide access to Native American burial site and connect it with the Education Center.
- Provide some level of handicap accessibility.
- Provide historical, environmental, and educational markers along the trails.
- Design trails that facilitate educational field trips.
- Limit the number of points of public access to site.

Public Comments

A member of the public expressed her view that there should be very limited trail access so that the site can remain as pristine as possible. Trails should be limited to museum or university access for research. It was also her view that the committee has underestimated how much funding would be necessary to build and maintain an education center. She suggested the committee look at a cost breakdown per expected visitor.

Next Meeting Date

The next meeting will be Wednesday, April 11, 2001.



000016



FULL BOARD MEETING
Services Building Conference Room

Saturday, March 10, 2001

MINUTES – DRAFT OF 3/30/01

The Fernald Citizens Advisory Board (FCAB) met from 8:30 a.m. until 12:00 p.m. on Saturday, March 10, 2001, at the DOE Fernald Site in Hamilton, Ohio. The meeting was advertised in the Federal Register and in a postcard mailing sent to local key stakeholders.

Members Present

French Bell
 Jim Bierer
 Sandy Butterfield
 Marvin Clawson
 Lisa Crawford
 Steve Depoe
 Lou Doll
 Pam Dunn
 Gene Jablonowski
 Jane Harper
 Steve McCracken
 Graham Mitchell
 Robert Tabor

Members Absent

Fawn Thompson
 Thomas Wagner
 Gene Willeke

Designated Federal Official

Gary Stegner

Phoenix Environmental Staff

Douglas Sarno
 Lois Yasutis

Fluor Fernald Staff

Tisha Patton

Approximately 25 spectators also attended the meeting, including members of the local community, and representatives from the Department of Energy (DOE) and Fluor Fernald (Fluor).

1. Call to Order

Jim Bierer called the meeting to order at 8:35 a.m.

2. Report on SSAB Chairs Conference

Jim Bierer reported on the February 2001 Environmental Management Site Specific Advisory Board (EMSSAB) Chairs conference in Las Vegas. Attendees shared information and concerns about SSAB operations, including board composition, committee design and their functions, recruitment, public outreach, workplans, and decision-making processes. With one exception, the Chairs from each site endorsed the SSAB Core Values Statement on Stewardship.

Jim noted that DOE's failure to request adequate funding was a concern shared by all the SSABs. The SSAB Chairs proposed sending a joint letter to Secretary Abraham stating their concerns. After review of a draft of the letter, the Board agreed to endorse it with the recommendation that all references to nuclear power be omitted. The FCAB believes that as an Environmental Management advisory board it is inappropriate for them to suggest a position on nuclear power and to do so weakens their position on the environmental issues. The Board will notify Ken Bracken, Chair, Hanford SSAB, who will be sending the final letter to Secretary Abraham.

3. General Remarks and Announcements

The public comment period on the DOE Public Participation Policy ends April 30, 2001. Board members were asked to review the policy in preparation for the April meeting.

Having received no response from the Centers for Disease Control (CDC), the Board decided to send a letter to Health & Human Services Secretary, Tommy G. Thompson, addressing their concerns about the cancellation of the Fernald Health Effects Subcommittee. Ex-officio Board member, French Bell, verified that the CDC did receive the Board's correspondence.

The Board reviewed its past recruitment efforts and discussed future action. One Board member is inactive due to distance, and the Board agreed to work with her towards a solution.

The FCAB 2001 meetings were rescheduled for the months of April, July and November as follows:

April 2001 Stewardship Committee Meeting, Wednesday, April 11, 6:30 p.m.
Full FCAB Meeting, Thursday, April 12, 6:00 p.m.

July 2001 Stewardship Committee Meeting, Wednesday, July 11, 6:30 p.m.
Full FCAB Meeting, Thursday, July 12, 6:00 p.m.

November 2001 Stewardship Committee Meeting, Wednesday, November 14, 6:30 p.m.

4. Ex-Officio Announcements

Steve McCracken reported that DOE is evaluating the sequencing of activities and validating operational controls and business systems under the new baseline. DOE is also evaluating its staffing requirements for the site.

The Board reviewed correspondence from Ohio EPA and USEPA to DOE. In their letters, the agencies expressed concerns about the current funding shortfall which will result in numerous missed milestones and jeopardize the environmental progress achieved at the site. Both agencies are also concerned that any scenario that "suspends" D&D, soils excavation, and/or OSDF operations would not be consistent with regulatory requirements that remedial action be both substantial and continuous (CERCLA, §120(e)(2)).

In a separate letter to DOE, Ohio EPA stated that DOE's inadequate funding request to Congress suggests a lack of commitment towards settlement of the State of Ohio's natural resource damage claims and the implementation of natural resource restoration at Fernald. They have asked DOE to respond in writing by April 1, 2001.

The Board also reviewed a letter to DOE Secretary Abraham from the Alliance for Nuclear Accountability (ANA), a national network of organizations working to address issues of nuclear weapons production and waste cleanup. It states that "...the DOE budget threatens human health and the environment because of hidden cuts to Environmental Management cleanup programs." The ANA asked the Secretary to meet with them to discuss their concerns.

The Centers for Disease Control and Prevention public health assessment for the site will be available in April. French Bell reported that there have been no new findings, but that the assessment will address concerns raised during the public comment period. Copies of the assessment will be provided to the Board.

5. Silos and AWR Update and Discussion

Silos 1 and 2. John North, Durotec Federal Services, reported that under the new contract silos remediation work will be performed by an integrated team of personnel from Fluor Fernald, Durotec Federal Services, and Jacobs Engineering. The team is working to complete a conceptual design approach for retrieving, stabilizing and shipping waste by truck to the Nevada Test Site. It is anticipated that Jacobs Engineering will begin detailed designs next month. The designs will be completed over the next few years. Operations are currently expected to begin in April 2006 with completion expected in 2008.

Silo 3. Karen Wintz, Fluor Fernald, reported that the team is evaluating technical alternatives for each phase of the project to determine the best solution. Then they will look at performance alternatives on contracting, cost, and implementation. Once the team has formulated the best technical and performance approaches, they will develop

a full project scenario for presentation to Fluor management and DOE. The five phases and their technical alternatives are:

Retrieval. Alternatives for retrieval include mechanical excavation (mining from the shaft at ground level), direct vacuum, remote pneumatic, or slurry methods.

Stabilization. Alternatives for stabilization of the waste material include passive stabilization (no mixing), employing a mixing screw or batch mixer, continuous mixing, and combining the treatment of Silo 3 waste with Silos 1 & 2.

Packaging/Transfer. Alternatives include bulk transfer, or packaging waste in "supersaks," boxes, or drums.

Shipping. Alternatives include shipments by rail in separate gondola cars or blended with waste pit material, by rail in non-gondola cars, or by truck.

Disposal. Two sites will accept silo waste: Envirocare, located in Utah, and the Nevada Test Site.

Accelerated Waste Retrieval (AWR). Bob Fellman, Fluor Fernald, reported that Fluor expects to receive a final project design from Foster Wheeler in March and to receive DOE approval of the remedial action workplan in April. Fluor estimates that construction of AWR components onsite is approximately 22% complete, and an additional 10-15% of the components have been constructed offsite.

The AWR program is about eight months behind schedule due to contractual difficulties that have resulted in a work slowdown by Foster Wheeler. Fluor estimates the program to be eight months behind schedule. Based on its projected costs, Foster Wheeler has submitted a Request for Equitable Adjustment to increase the value of its contract an additional \$53 million over the original value of \$52 million in 1999. Although Fluor does not support the entire increase amount, they will continue to negotiate with Foster Wheeler and in concert with DOE to salvage the contract's existing value. Since good technical design and structure for the AWR program is in place, Fluor is cautiously optimistic it can move forward, with or without Foster Wheeler, with a minimum of scheduling delays.

Members of the Critical Analysis Team reiterated their concerns about the robotic equipment known as "EMMA." It is their opinion that without EMMA the bulk of the waste retrieval can be done with conventional sluicing equipment and minor or no modifications to the existing design. Bob Fellman iterated that although EMMA is not essential to the project, it might be desirable to facilitate retrieval. He also said that there are existing costs associated with EMMA even if it is removed from the design.

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6. Discussion on Rebaseline Scenarios

The Board continued its review of the top two scenarios Fluor is considering for its new baseline. The Board reviewed funding breakdowns of costs per year for each of the scenarios. The scenarios are designated in these minutes as Scenario Nos. 3 and 6. All of the rebaseline scenarios were discussed at the February 5, 2001 meeting of the Board.

DOE has given Fluor approval to proceed with its contractor forward funding concept. Fluor issued a Request for Proposal and expects receipt of proposals on or about March 13th, to be followed by a review process and award recommendation to DOE. Though the contractual fundamentals of forward funding are in place, there is no guarantee that a viable proposal will be received.

The Board's discussion of the rebaseline scenarios centered on risk management and the likelihood of continued adequate funding during implementation. The assumption that funding will remain at \$290 million per year is extremely unrealistic; and, therefore, flexibility should be a key factor of any scenario that is ultimately selected. Also ensuring effective risk management is in place on high priority projects would help mitigate impacts of any decrease in funding. In Fluor's opinion, a decrease in funding would cause serious impacts under either scenario, but the impacts would be more dramatic under Scenario 3 because every project would already be running at reduced levels of efficiency.

It is the Board's opinion that they and the Fernald stakeholders have a long history of seeking consensus and making concessions in order to do the right thing—for the environment, for the good of the Fernald community, and as good citizens of the United States—but that the current funding shortfall is a direct result of insufficient funding requests from DOE Headquarters to Congress and shows a lack of commitment on DOE's part.

The Board decided that it could not endorse a specific rebaseline scenario, but would recommend the components and processes that should be a necessary part of the development and implementation of a final scenario. The following recommendations will be sent to DOE:

Overriding Issues. While the Fernald Citizens Advisory Board (FCAB) is willing to work with DOE to ensure the most efficient and timely remediation of the Fernald site, we have not lost sight of the fact that the current funding shortfall is a direct result of insufficient funding requests from the Department of Energy to Congress. The FCAB and the Fernald community have worked very closely with DOE to create a model for how cooperation can be used to promote good decision-making. This has not been without great compromise on the part of the Fernald community. A major result of these efforts was to receive the Defense Closure Site designation from Congress, which was to ensure the completion of

Fernald by 2006. DOE by its actions has thwarted efforts by the Fernald community and the will of Congress to bring this about. The FCAB will continue to work to ensure this situation is somehow remedied. With that in mind, the FCAB recommends that DOE take the following actions in developing a new baseline for the Fernald site:

DOE must continue to ensure the focus on a safe work environment for all Fernald projects .

DOE should consider the total project in making its decisions and setting priorities.

DOE must ensure that sufficient flexibility is built into all planning aspects in order to deal with the high level of risk that is inherent to all remediation activities, particularly with regard to the Silos.

DOE must aggressively pursue increased efficiencies throughout all aspects of the Fernald site to ensure that the maximum amount of funding possible is being spent on projects resulting in real environmental progress.

DOE should keep working with the Critical Analysis Team (CAT) to ensure independent review and advice on all aspects of the Silos project.

AWR. DOE should move aggressively to resolve subcontracting issues quickly. DOE should proceed as soon as possible to complete the work of the AWR in the most beneficial way for the site, whether by the current subcontractor or by Fluor Fernald. DOE should pursue, wherever possible, proven approaches in all technical aspects of the project, particularly in the removal of waste from the Silos.

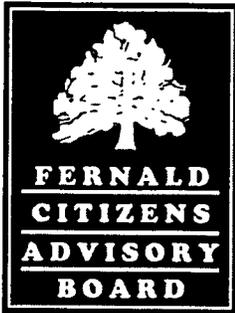
Silos 1 & 2. DOE should move forward to develop a straightforward means of treatment relying on proven technologies whenever possible.

Silo 3. DOE should move forward with Silo 3 aggressively. DOE should use simple proven technologies to the maximum extent possible in both the removal and treatment of Silo 3 material. DOE should synergize transport and disposal to the maximum extent possible with the waste pits project.

Waste Pits. DOE should proceed as quickly as possible to complete the waste pits project.

D&D. DOE should use forward funding as a means to accelerate this work only if it proves to be beneficial to overall site completion.

Natural Resources. DOE should continue to make progress on natural resource restoration to the maximum extent practical given the likely slowdown in soils



STEWARDSHIP COMMITTEE MEETING
Services Building Conference Room

Wednesday, April 11, 2001

DRAFT AGENDA

- | | |
|----------------|---|
| 6:30 p.m. | Call to Order |
| 6:30–6:45 p.m. | Remarks and Announcements |
| 6:45–7:15 p.m. | Natural Resource Trustee Issues Related to Rebaselining |
| 7:15–7:30 p.m. | Native American Reinterments |
| 7:30–8:30 p.m. | Public Use Scenarios and Criteria for Trails |
| 8:30–8:45 p.m. | Public Comment |
| 8:45 p.m. | Adjourn |
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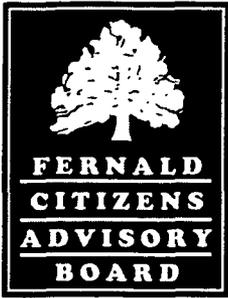


FULL BOARD MEETING
Services Building Conference Room

Thursday, April 19, 2001

DRAFT AGENDA

- | | |
|----------------|--|
| 5:30 p.m | Dinner |
| 6:00 p.m. | Call to Order |
| 6:00-6:15 p.m. | Chair's Remarks and Ex Officio Announcements |
| 6:15-6:25 p.m. | Update on Fernald Health Effects Subcommittee |
| 6:25-6:45 p.m. | Update on Waste Pits |
| 6:45-7:00 p.m. | Update on Uranium Water Remediation Levels |
| 7:00-8:00 p.m. | DOE Update on Rebaseline |
| 8:00-8:45 p.m. | Discussion and Recommendations on Public Use Scenarios |
| 8:45-9:00 p.m. | Public Comment |
| 9:00 p.m. | Adjourn |
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Memorandum

DATE: March 28, 2001
TO: FCAB Members
FROM: Doug Sarno
RE: Summary of CAT Report #20 on Revision of FEMP Baseline

The Critical Analysis Team (CAT) issued Report #20, dated March 10, 2001, on the revision of the Fernald Environmental Management Project baseline. The CAT reported concerns with the major planning assumptions made about funding and Accelerated Waste Retrieval (AWR) and issued two recommendations. See Report, pages 1-2.

Recommendation 20-1: The impacts of reduced (below \$290 million) Fernald funding should be fully considered in making the revised baseline decision.

Recommendation 20-2: The potential for significant baseline impacts due to AWR delays should be fully considered in making the revised baseline decision.

The report also outlined specific areas of concerns about the baseline process, including:

- (1) the presentation and analysis of alternative scenarios was inconsistent,
- (2) some planning and budget assumptions do not appear realistic,
- (3) rapidly changing staffing levels is difficult,
- (4) assumptions of silos project progress and performance may be optimistic,
- (5) the efficiencies required to work within a flat budget are very demanding, and
- (6) the scenarios lack any evaluation of possible regulatory action due to noncompliance. See Report, pages 3-6.

Overall, the report identifies many of the critical questions and challenges we discussed in evaluating the rebaseline scenarios. Many of the issues raised will play out over time requiring our continued attention. I strongly recommend everyone read the full report.

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Critical Analysis Team Report
on
Revision of the Fernald Environmental Management Project
Baseline

CAT Report #20¹

10 March 2001

I. Major Comments on the Baseline Revision Package.

The Critical Analysis Team (CAT) has reviewed the alternatives associated with revising the Fernald Environmental Management Project Baseline. The CAT commends both DOE and Fluor Fernald for the extensive stakeholder involvement efforts undertaken to ensure public values are reflected in any new baseline direction.

The CAT's scope of work currently includes only the Silos Project. Therefore, the bulk of CAT comments pertain to silos issues and impacts of the alternatives.

Planning efforts of this magnitude and complexity are generally accurate for little more than one year. When plans are overtaken by events, it is often due to an original planning assumption that proved to be false. In the case of this rebaselining, the following two questions are based on major assumptions about the future. Each question should be asked of each scenario in assessing the best path forward.

If funding is reduced below \$290 million, what doesn't get done? This question is based on the assumption that Fernald will receive a flat budget of \$290 million for the next ten years. While \$290 million is a significant cut for Fernald, it is by no means a guaranteed funding level. It is likely (particularly over the next decade) that Fernald's budget will be increased or decreased. Because of this, it is important to judge each scenario's strength based in part on its budgetary flexibility. Most importantly, each question must be asked when each scenario is considered.

What are the impacts if AWR and/or Silos 1,2, and 3 treatment efforts fail? This question is based on the two-fold assumption that, (1) the Accelerated Waste Retrieval project will finish on-time and within budget; and (2) the Silos 1,2, and 3 treatment effort can be designed, constructed and operated as planned.

¹ CAT Report #20 is the first CAT Report under a new charter that establishes a more direct link between the CAT and DOE-Fernald.



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The CAT's concerns with the AWR project are well documented. While AWR has made progress, the project is currently behind schedule with the potential to fall further behind. Ultimately, delays to AWR could greatly increase the cost of the project thereby significantly impacting baseline assumptions. Because of this, each scenario should be judged under hypothetical cost and schedule growth in AWR. Lastly, very little information exists as to the Silos 1, 2, and 3 effort and, given the Silos Project history, the CAT is reticent to assume success.

Recommendations

Recommendation 20-1: The impacts of reduced (below \$290 million) Fernald funding should be fully considered in making the revised baseline decision.

Recommendation 20-2: The potential for significant baseline impacts due to AWR delays should be fully considered in making the revised baseline decision.

II. Specific Comments on the Baseline Revision Package

The above represents the CAT's two most significant concerns. Following are more specific comments about the baseline revision package.

Presentation and analysis of alternative cases should be consistent.

- Scenario 6 Silos Project Training, SOT, and Readiness activities overlap construction by six months. This overlap is a reasonable planning assumption. However, a similar overlap does not exist for Scenario 3 Silos Project. This accounts for nearly six months difference in project completion.
- Why does construction take three months longer for Scenario 3 than Scenario 6?
- The Scenario 6 data includes a four-page summary of important information. Why isn't similar information provided for Scenario 3?
- The legend on the schedules is not the same. Scenario 6 has an Early bar, Progress Bar and Critical Bar Activity Bar. Scenario 3 has an Early Bar, Target Bar, Progress Bar and Critical Activity Bar. If one is to make comparisons, the schedule presentation formats should be identical.
- The Scenario 3 timeline used or presented in the CAB meeting materials is different from the Scenario 3 presented in the Funding Prioritization Scenarios binder. For example, the binder shows 6/09 for completion of the Silos Project, the CAB materials show 10/08; Scenario 3 shows 10/05 for conclusion of waste pits, the CAB materials show 3/06.

Some planning assumptions do not appear realistic.

- Successful contractor funding of D&D is probably not viable. This approach raises multiple legality questions (re: committing DOE to expenditures not yet appropriated). In addition, the approach is vulnerable to the same failure mechanisms as privatization.
- While successful examples of key personnel retention exist, such efforts rarely meet with success. Retaining key personnel requires maintaining meaningful work scope, and equivalent responsibility and authority for each individual. Further, maintenance of only three key project personnel will accomplish little without a skilled staff. Such a staff is unlikely to be drawn from the general worker population.

The retention program objectives will be difficult to meet given the reduced work on the project and the fact that key personnel will likely prefer to transfer to more rewarding work elsewhere. Strong, effective management of the retention program will be critical to success.



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- Complicated long-range cost and schedule estimates are inherently risky. The contingency included in the revision scenarios is extremely low (\$5 million per year or only about 2%). Failing to include reasonable contingency virtually ensures most of the projects will be over budget and schedule.

Rapidly changing staffing levels is extremely difficult.

- Scenario 3 Silos Project (PBS 07) increases staffing by 509% (from 71 to 362 FTEs) between FY 2004 and FY 2005. This staffing level then drops by 50% between 2005 and 2006 (from 362 to 180 FTEs) and then is increased again in FY 2007 by over 100% (from 180 to 410 FTEs). Scenario 6 has an increase in staffing from FY 2004 to 2005 of 525% (from 85 to 447).

These dramatic staffing changes raise two concerns: (1) ability of Fernald to hire, train, reassign and badge qualified personnel to effectively and efficiently support the project; and (2) the cost of such personnel shifts.

First, the Scenario 3 Silos Project timeline shows training beginning at the end of FY 2005 and operations beginning the last quarter of FY 2006. The staffing levels do not appear to correlate with these project activities. Furthermore, personnel cannot be reassigned this rapidly, and if they are, the reassignment is likely to prove ineffective. It would be extremely difficult to effectively manage a DOE project with such large staffing fluctuations.

Second, the increase in staffing for both scenarios from FY 2004 to 2005 do not appear to be accompanied by commensurate increases in labor costs. For Scenario 3, the labor force increases by 362 yet labor costs only increase \$19 million (thus, each person costs \$66,000). For Scenario 6, the labor force increases by 291 yet labor costs only increase by \$24 million (thus, each person costs \$55,000). These labor costs appear low.

Lastly, the average FTE labor rate increases between FY 2001 and 2009. It appears that these increases are due to 3% annual escalation. However, between FY 2002 and 2003, the rates actually decrease. What is the cause of this?

Assumptions of Silos Project progress and performance may be optimistic.

- A scenario in which silos is fully funded yet fails to perform is possible. In this case, the credibility of the entire Fernald site will be at stake—money and time will be spent with little or no demonstrated progress. To mitigate this risk, if a silos full funding approach is chosen, Fluor Fernald and DOE must develop a plan that virtually guarantees success. The plan must provide for quick identification, evaluation, and correction of any failure-to-perform issues that arise.

Budget Assumptions

- The CAT is not clear on funding and escalation issues pertaining to the flat \$290 million funding scenario. It appears (from Susan Brechbill's letter) that the \$290 million will never be adjusted for escalation, but Fluor Fernald's cost estimates do assume escalation when considering total budget. Clarification and consistency in the use of the \$290 million budget level and its escalation assumptions is needed.
- The shortfalls projected in 2001 and 2002 should not be overlooked. These two Fiscal Years, if projections are correct, will create massive challenges—Fernald will have to become 50% more efficient in 2002 than 2001 ($\$23/313=7.3\%$ vs. $\$34/324=10.5\%$).
- If Fernald were to receive full funding for the next five years, it remains unlikely that 2006 project closure could be met.
- Current Environmental Management budget uncertainty raises the question of Fernald impacts of a *less than* \$290 million scenario. To fully bound potential impacts, Fluor and DOE should consider developing a worst case scenario budget profile. If a reduced budget case is required for DOE-Headquarters submittal, this case could simply be applied to the baseline development discussion.
- The Scenario 6 Funding Scenario Impacts states: Escalation—Used current MPM rates (3%/yr.) for out-year escalation. However, the Element of Cost—Baseline uses escalation figures from 1.14 to 1.5 Why is there a difference?
- The FY 2002 Funding Impact Analysis – Fernald sheet states, “An additional \$34M in funding pursuant to the original baseline funding profile, in FY 2002 and beyond, would allow Fernald to stay in compliance in FY 2002 and would also position the project to meet milestones and regulatory expectations in subsequent fiscal years.” This statement implies that the shortfall in FY 2001 and the “ripple effect” written of earlier is not actually critical to site closure.

Alternative 6 and Alternative 3 Specifics

- Scenario 6 Silos Project schedule shows start-up of AWR six months after training, readiness and completion of construction. Why is startup delayed by six months?
- Scenario 3 Silos Project Training, SOT, and Readiness activities are not started until construction is complete. As a result, start-up is delayed one year after construction. Such activities generally begin during construction. It seems operations could be initiated nine months earlier if the above activities occurred concurrent with construction.
- The regulatory perspective is missing an important piece—possible regulatory action. An understanding of the severity of potential regulatory actions due to noncompliance is useful in effectively evaluating the alternatives and making sound baseline decisions.



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- The Reduction of Radioactivity (Curies) and the Potential Risk to the Undeveloped Park User seem to indicate no significant discrimination between the scenarios. Assuming the risk scale is the expected increase risk of a fatal cancer from a predetermined exposure, the difference in the scenarios in reaching a level considered protective of public health by EPA ($1.0E-04$ to $1.0E-06$) is little more than three years. Further, this risk is present during a period of time when it is reasonable to assume that exposure will be limited through continued DOE control of the Fernald site (2008-2011). Given this, risk reduction timing does not seem to differentiate between the scenarios.



Memorandum

DATE: March 30, 2001
TO: FCAB Members
FROM: Doug Sarno
RE: Fernald Site Occurrence Reports

The attached report documents the release of approximately 35,000 gallons of untreated wastewater from the Bionitrification Surge Lagoon to Paddy's Run via the Pilot Plant Drainage Ditch. It was determined that there was no significant impact to the environment as a result of the release, which was caused by a defective pipe weld, and that the released water did not spread to any areas that were not previously contaminated.

Although the FCAB agreed not to get bogged down reviewing every detail of site operations, Jim and I agree that we should be made aware of occurrences of this magnitude. I have requested that the FCAB receive a copy of all future occurrence reports.

Occurrence Report

Fernald Environ. Mngmnt. Project

(Name of Facility)

Environmental Restoration Operations

(Facility Function)

Fernald Environ. Mngmnt. Project

Flour Fernald Inc.

(Laboratory, Site, or Organization)

Name: David J. Brettschneider

Title: ARWWP Manager

Telephone No.: (513) 648-5814

(Facility Manager/Designee)

Name: HOBBS, ANDREW F

Title: INCIDENT INVESTIGATOR

Telephone No.: (513) 648-4386

(Originator/Transmitter)

Name:

Date:

(Authorized Classifier (AC))

1. Occurrence Report Number: OH-FN-FFI-FEMP-2001-0002

Untreated Wastewater Released from Bio-Surge Lagoon

2. Report Type and Date: Update/Final

	Date	Time
Notification:	02/01/2001	13:50 (MTZ)
Initial Update:	02/28/2001	08:09 (MTZ)
Latest Update:	02/28/2001	08:09 (MTZ)
Final:		

3. Occurrence Category: Off-Normal

4. Number of Occurrences: 1 Original OR:

5. Division or Project: Fluor Fernald/FEMP

6. Secretarial Office: EM - Environmental Management
7. System, Bldg., or Equipment: Pilot Plant drainage ditch, Paddy's Run
8. UCNI?: No
9. Plant Area: BiodN Surge Lagoon
10. Date and Time Discovered: 01/31/2001 09:58 (ETZ)
11. Date and Time Categorized: 01/31/2001 11:50 (ETZ)
12. DOE Notification:
13. Other Notifications:

Date	Time	Person Notified	Organization
01/31/2001	11:45 (ETZ)	Joe Desormeau	DOE-FEMP

14. Subject or Title of Occurrence:

Untreated Wastewater Released from Bio-Surge Lagoon

15. Nature of Occurrence:

- 02) Environmental
E. Environmental Agreement/Compliance Activities

16. Description of Occurrence:

On January 31, 2000, at 0958 hours the AEDO was notified of the release of approximately 35,000 gallons of untreated waste water from the Bionitrification Surge Lagoon (BSL), to Paddy's Run via the Pilot Plant Drainage Ditch. Water flowing in this ditch has the potential of infiltrating to the underlying aquifer beginning at a point just upstream from its confluence with Paddy's Run where the ditch has eroded through the protective glacial overburden. This was not a planned release per environmental permits and was reported within 24-hours to the OEPA.

At approximately 0958 hours, an environmental monitoring manager discovered gray-colored water leaking out of the ground near an air monitor at the southeast corner of the BSL in the Waste Storage Area. He notified the radiological control technician at the nearby radiological control point, who in turn notified the Utility Engineer, who is also the AEDO. The Utility Engineer and the Water Distribution Supervisor responded immediately to the scene and observed the flow of water which they suspected was coming from a below-grade line that runs from the BSL to the Advanced Wastewater Treatment (AWWT) facility. They verified that the associated pumps were running, then called the AWWT facility and instructed them to turn off the pumps through the distributive computer system (DCS). The flow of wastewater immediately subsided. The valves at the pumps discharge were

then closed. Outflow to Paddy's Run was visually checked, and it was determined that wastewater had flowed toward Paddy's Run.

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As the wastewater leaked, it ran down the south bank of the BSL into a swale, which flows into a 30-inch diameter culvert. The culvert runs south about 500 yards into the Pilot Plant Drainage Ditch. The ditch runs into Paddy's Run. At the entrance to the culvert there is sluice gate that is still in place, even though the equipment that it serviced no longer exists. The Water Distribution Supervisor closed the sluice gate, which prevented the remaining standing water from flowing into the culvert.

17. Operating Conditions of Facility at Time of Occurrence:

Rainfall in previous three days

18. Activity Category:

11 - Facility Decontamination/Decommissioning

19. Immediate Actions Taken and Results:

The UE/AEDO requested that samples of the released wastewater be collected by AWWT operations personnel. Samples were collected at the point of release from the BSL, and at sampling point SWD-03, which is the discharge point of the 30-inch diameter culvert. The samples were analyzed on site, with results of 2200 ppb-uranium at the release point, and 254.5 ppb-uranium at sampling point SWD-03.

Approximately 7000 gallons of wastewater that was contained by closing the sluice gate at the culvert was pumped into the K-65 trench, which feeds into the BSL. Construction work near the area was stopped until sample results were obtained. The Fluor Fernald EDO categorized the event as an Off-Normal Occurrence at 1150 hours.

On February 2, 2001, a maintenance crew began excavation of the area in order to locate the source of the leak. However, while excavating to expose the 6-in. carrier pipe, the excavation slumped in from the east toward the west, and snapped off the remnants of a capped 1-in. line. Excavation continued to expose the remainder of the 1-in. line and its saddle tap assembly. The remnants of the 1-in. line were removed and a 6-in. stainless-steel repair clamp was installed.

20. Direct Cause:

- 1) Equipment/Material Problem
 - C. Defective Weld, Braze, or Soldered Joint

21. Contributing Cause(s):

22. Root Cause:

- 1) Equipment/Material Problem
 - C. Defective Weld, Braze, or Soldered Joint

23. Description of Cause:

System Improvements' TapRoot(R) Root Cause Tree(R) was used to identify the causes of this occurrence.

--System Description

The BSL receives uranium-bearing wastewater from the entire FEMP site, excluding stormwater runoff from the former production area and contaminated groundwater. Wastewater is intermittently pumped from the elevated BSL to the AWWT through a 6-in. diameter pipe that originates at the pumping station located at the southeast corner of the BSL. In this same area there is a 1-in. diameter tap into the 6-in. line from a previously methanol storage tank located to the east of the BSL. The tap line runs perpendicular to the 6-in. line at about 4 feet below grade, then turns vertically and taps into the 6-in. pipe. About 1 year ago, in conjunction with the conversion of the methanol tank to a sludge storage tank, the tap line was capped off just below the vertical turn. An access roadway to the elevated pumping station causes the 1-in. tap location to be approximately 19 feet below grade.

--Cause

The direct and root cause of this occurrence was determined to be a defective weld. On February 15, 2001, a team consisting of the ARWWP project engineer, an AWWT maintenance supervisor, and two pipefitters, performed a detailed inspection of the removed section of 1-in. branch line and tap. The investigation team determined that the direct cause was essentially a failure of either the 1-in. branch line off of the 6-in. line or the actual tap of the 6-in. line. Determining the original failure point was impossible to verify because of the damage caused by the slumping of the soil in the excavation that caused the original tap to break free of the 6-in. line and kink the 1-in. branch line.

The results of this inspection were as follows:

- 1) The 1-in. branch line was inspected and showed no breaks except in the region of the kink caused by the slumping of the trench. This was not believed to be the source of the original leak, but a failure caused by the rapid bending of the line.
- 2) A 3-in. protective sleeve that was tack welded to the tap assembly was removed by cutting the tack welds with a "sawzall". This allowed the sleeve to be fully removed and the tap assembly inspected. This revealed that the tap appeared to be a shop fabrication that was field-welded to the 6-in. line. The shop-fabricated tap assembly consisted of a 1-in. weld-o-let that was welded to a saddle section of pipe approximately 3 in. by 5 in. A short section of 1-in. line extended from the weld-o-let to a coupling approximately 8 in. from the saddle section. The saddle section was then welded to the main 6-in. line which had a hole cut in it.
- 3) It appeared as though the slumping of the excavation pulled the tap assembly and 3-in. protective sleeve completely free of the 6-in. line. In pulling off of the 6-in. line, failure of the saddle welds, as well as failure of the base 6-in. piping, was observed.

A review of the design of this tap was inconclusive. For example, one drawing, #18A-1920-G-00296 "Biodenitrification System Surge Lagoon Plan" (originally certified 01/13/1984) contains a note #10 which states: "Provide 1/2" tap in CE-6"-M and connect PAM 1/2"-A using corporation stop (Mueller

H-10045 or approved equal)." However, whether this was the final design is questionable, since the installed tap line is actually a 1-in. diameter line, and there is no corporation stop installed. Still, based on these data, it could at least be determined that either the design was inadequate, or the implementation of the final design was inadequate.

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Based on the inspection discussed above, the original leak is believed to have resulted from a failure of portions of the welds holding the tap assembly to the base 6-in. pipe. The failed welds did not appear to provide adequate fusion of the base metal of the 6-in. pipe to the filler metal of the weld and was most likely the point of the original leak.

24. Evaluation (by Facility Manager/Designee):

Because of a low volume of wastewater in the BSL, the 6-in. line from the BSL to the AWWT had not operated since January 2, 2001. To protect the line from freezing, the line had been drained after it was turned off on January 2. Pumping was restarted on January 30. The leak was discovered on January 31. Therefore, the estimated release of 35,000 gallons of wastewater is based on the estimated flow rate of the observed leak, and the time from when the pumps had been started on the 30th until the pumps were shut down on the 31st. For the estimation of uranium release, it was assumed that all 35,000 gallons reached Paddy's Run.

The impact to the environment from this release is negligible as it does not at all affect the planned environmental remediation for this area.

25. Is Further Evaluation Required?: No

26. Corrective Actions

(* = Date added/revised since final report was approved.)

1.

A repair clamp was installed on the 6-in. pipe. This installation has been deemed to be acceptable as a permanent fix for the projected service life of the pipeline.	
Target Completion Date: 02/02/2001	Completion Date: 02/02/2001

2.

There are two similar below-grade taps on the original BSL underground discharge piping section (a 2-in. drain line at the BSL pumping station, and a 1-in. cross-connect at the south end). Since both taps no longer have a functional use, they will be removed and the piping permanently repaired in a similar fashion. (The other sections of the BSL pipeline are exposed and observable, or have previously been rerouted and replaced with HDPE piping.)	
Target Completion Date: 05/31/2001	Completion Date:

27. Impact on Environment, Safety and Health:

There was no significant impact to the environment as a result of this release, nor to the remediation efforts that are already planned for the area where the release occurred. The groundwater in this area is already contaminated, for which remediation is planned to begin in FY2002. It is believed that the released water did not spread to any areas that were not previously contaminated.

Based on 35,000 gallons of wastewater released from the BSL containing normal uranium, and a

maximum concentration at the point of release from the BSL of 2200 ppb-uranium, it is estimated that 0.448 pounds of uranium was released to the environment as a result of this event. The lowest CERCLA/SARA reportable quantity (RQ) for uranium is 100 pounds in a 24-hour period. Other regulated substances that were suspected to be in this release, based on process and historical knowledge, were also evaluated. There is no concern that any of these substances will reach its respective RQ for this event.

28. Programmatic Impact:

None

29. Impact on Codes and Standards:

None

30. Lessons Learned:

This occurrence reinforces the need for facility monitoring and quick response to unexpected conditions in order to mitigate the consequences of events and unplanned releases.

31. Similar Occurrence Report Numbers:

1. None

32. User-defined Field #1:

33. User-defined Field #2:



Centers for Disease Control
and Prevention (CDC)
Atlanta GA 30333

March 15, 2001

Mr. James C. Bierer
Chair
Fernald Citizens Advisory Board
MS 76
Post Office Box 538704
Cincinnati, Ohio 45253-8704

Dear Mr. Bierer:

I am writing in response to your letters in which you and members of the Fernald Citizens Advisory Board express concern about the status of the Fernald Health Effects Subcommittee (FHES).

As you know, the FHES was established to provide advice to the Centers for Disease Control and Prevention (CDC) and the Agency for Toxic Substances for Disease Registry (ATSDR) on their health activities at the Fernald site. Last year, at meetings of the subcommittee in March and September, we discussed whether it was appropriate to consider concluding the subcommittees' business. The basis for this discussion was the fact that CDC and ATSDR's activities around the site have concluded or are nearing completion. Any decision regarding the future of the FHES would need to be agreed to jointly by CDC and ATSDR. You may also be aware that during this time, a CDC contractor, COSMOS, was completing an evaluation of the subcommittee advisory process.

At the September meeting, we all agreed that CDC and ATSDR would consider the comments heard at the meetings and also await the results of the evaluation process before making a final decision on the continuation of the FHES. The COSMOS evaluation was completed in December and the report was provided to all members of the site specific health effects subcommittees and CDC and ATSDR staff to review.

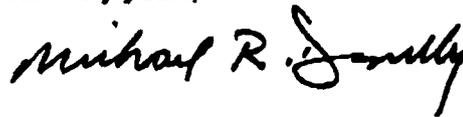
We anticipate a final decision on the FHES in the very near future and plan on communicating

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Page 2 - Mr. James C. Bierer

that decision to all interested parties, including the Fernald Citizens Advisory Board.

Sincerely yours,



Michael R. Donnelly
Deputy Chief, Radiation Studies Branch
Division of Environmental Hazards and Health Effects
National Center for Environmental Health

cc:

- Mr. Steve Ahrenholz, NIOSH
- Mr. Burt Cooper, ATSDR
- Mr. Steven H. McCracken, DOE

March 19, 2001

The Honorable Doc Hastings
Chairman
House Nuclear Cleanup Caucus
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Hastings:

On behalf of our respective companies, we compliment you for the leadership that you have provided on behalf of all who share an interest in safely and expeditiously fulfilling the objectives of the Department of Energy's (DOE's) Environmental Management (EM) Program.

We are writing to address important points made by you and your fellow Members of the House in your February 14, 2001 joint letter to DOE Secretary Spencer Abraham and OMB Director Mitch Daniels, Jr., regarding the adequacy of funding for the DOE EM program. We, whose companies and whose contractual obligations put them on the front lines in performing important management and cleanup roles at DOE sites which contributed to winning the Cold War, share your concern for meeting the various priorities throughout the DOE complex.

Often during the Appropriations, supporters of various Federal programs are accused of - sometimes fairly - placing parochial funding needs above broader national priorities. Now more than ever, such an attitude would have serious repercussions for the EM program as a whole as well as for some individual sites and jeopardize the significant progress being made in cleaning up DOE facilities. Quite simply, the EM program has reached a point where one facility relies on another elsewhere in the complex to reach the next milestone for issues such as material storage or disposal. We are linked through a series of dependent activities, where a slowdown at one point will have consequences throughout the system.

While each of our companies is understandably concerned about the adequacy of funding for those sites where we have specific responsibilities, you and your colleagues should know that we have collective concerns over the adequacy of the overall level of funding being considered for the Fiscal Year 2002 EM budget. While an inadequate overall Federal financial commitment to EM will have substantial negative effects on progress being made at the various sites, it may even pose serious issues of noncompliance at some or all of them. Conversely, a strong Federal commitment now is not only critical to meeting very real health, safety and environmental needs, it will result in a substantially lower long-term cost to the taxpayers.

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The Honorable Doc Hastings
March 19, 2001
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Consequently, we pledge our unified commitment to work with you as this year's budget process moves forward to ensure adequate funding for needs of the entire EM program. Thank you again for your continued leadership in Congress on DOE facility management and cleanup issues. We look forward to aggressively supporting your efforts.

Sincerely,

Tom Hash
President
Bechtel National, Inc.

Paul A. Miskimin
President & CEO
BNFL Inc.

E. Allen Womack
President
BWX Technologies, Inc.

Jonathan G. Curtis
President and CEO
CDM Federal Programs Corporation

Ralph R. Peterson
Chairman, President and CEO
CH2M HILL Companies, Ltd.

Tom Roell
President
Fluor Federal Services

Sam Box
President and CEO
Foster Wheeler Environmental Corporation

Anthony J. DeLuca
Chief Executive Officer and President
The IT Group, Inc.

Noel G. Watson
President and Chief Executive Officer
Jacobs Engineering Group Inc.

William Robertson
CEO
Roy F. Weston, Inc.

Dr. J. R. Beyster
Chairman and CEO
SAIC

Ambrose L. Schwallie
President & CEO
Washington Government

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Department of Energy

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



MAR 30 2001

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

DOE-0453-01

Mr. Bill Kurey
U.S. Fish and Wildlife Services, Suite H
8950 Parkway
Reynoldsburg, Ohio 43088

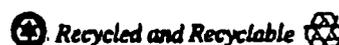
Dear Mr. Schneider and Mr. Kurey:

**TRANSMITTAL OF RESPONSE TO OHIO ENVIRONMENTAL PROTECTION AGENCY AND
U.S. FISH AND WILDLIFE SERVICES CONCERNS REGARDING ONGOING NATURAL
RESOURCE RESTORATION PROGRAM AT THE FERNALD ENVIRONMENTAL
MANAGEMENT PROJECT**

Reference: Letter, T. Schneider, OEPA, and W. Kurey, USF&WS, to S. McCracken,
DOE-FEMP, "NRT Concerns on Re-sequencing Remediation and
Restoration Efforts," dated February 28, 2001

The purpose of this correspondence is to address concerns raised by Natural Resource Trustee (NRT) representatives for the Ohio Environmental Protection Agency (OEPA) and the United States Fish and Wildlife Service in the above referenced letter regarding the Department of Energy's (DOE) commitment to the Natural Resource Restoration Program at the Fernald Environmental Management Project (FEMP). To address the primary concern raised in the referenced letter, it should be clearly understood that DOE remains committed to the implementation of the restoration work at the FEMP consistent with the Refined Scope Document developed by the NRTs. Further, DOE remains committed to the completion of the refined scope consistent with the endpoint negotiated by the NRTs and contained in the 1998 Natural Resource Restoration Plan (NRRP) schedule and the Refined Scope Document.

As outlined in numerous recent conversations, the Closure contract between Fluor Fernald, Inc., and DOE will require that the approach to integration of restoration activities with remediation of the FEMP be re-examined to determine the most efficient and cost-effective



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Tom Schneider
Bill Kurey

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approach to completing closure (i.e., restoration). As conveyed in a number of recent discussions, this may involve the delay of some key projects ongoing at the FEMP, such as Soil and Disposal Facility Project (SDFP), and the implementation of large-scale restoration projects. It is important to point out that no final decisions have been made at this time regarding the sequence of projects under the new contract, or the magnitude of any delays that may occur. DOE recognizes that the re-sequencing and delay of key projects may require that a new approach to implementing restoration work at the FEMP be developed and agreed upon by the NRTs. DOE wants to emphasize there is no desire to substantively change the scope of planned restoration work or change the desired endpoint for completion of restoration work at the FEMP. In light of recent discussions by the NRTs, it is anticipated that some modification to planting locations would occur from what was presented in the refined scope, but the size and density of plant material to be installed would not change.

It is important to point out that while efficiency and cost considerations may result in full-scale restoration projects being delayed for several years, DOE does plan to continue interim actions to properly prepare the FEMP site for restoration. DOE believes there are many actions which can be implemented as maintenance/management activities that are not cost prohibitive, and will have significant benefit to the overall restoration of the FEMP. Under the current restoration approach, activities such as invasive/aggressive species control, seedbed preparation, seeding of native grasses and select hydrologic investigations would be implemented immediately prior to, or in parallel with, installation of native plants. The re-sequencing approach being considered would provide the opportunity for maintenance/management activities to be completed in a systematic manner over the next three years to prepare non-remediated areas for future restoration work. It is also important to point out that this work would be planned and implemented by existing restoration personnel within Fluor Fernald. The completion of the listed interim actions would allow restoration work (once initiated) to focus primarily on installation of native trees and shrubs into areas already prepared for planting.

The general approach being considered by DOE for restoration of the FEMP can be summarized in the following general schedule:

2001 - 2003

- Secure contracts for plant material needed for future restoration work,
- Collect Baseline and Reference Site ecological data,
- Systematic removal of invasive/aggressive species,
- Management of the deer herd on the FEMP,
- Seeding to convert old field and pasture areas to prairies (following control of existing grasses),
- Investigation of hydrology in select areas of the FEMP.

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Tom Schneider
Bill Kurey

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2004 - 2009

Phased implementation of the following Restoration Projects that would encompass all restoration projects currently included in the NRRP and Refined Scope:

- Southern Waste Unit Restoration (Area 2 Phase I)
- North Woodlot Restoration (Area 1 Phase III, Area 1 Phase I, Area 6 North)
- Paddys Run Corridor Restoration (Area 8 Phase III, Area 2 Phase III, Area 2 Phase II)
- Production/Waste Pit Area Restoration (Areas 3 through 6)
- Silos Area Restoration (Area 7)
- On-Site Disposal Facility Perimeter/Borrow Area Restoration (Area 1 Phase I, Area 1 Phase II)

Another key advantage of the approach outlined above is that it would allow lead time to secure plant material for future restoration work, thereby providing DOE with guaranteed plant stock at the best prices available. As noted above, securing plant material through some type of plant contract approach would begin immediately. Securing plant contracts up front not only provides assurance that desired plants will be available when needed, but also further demonstrates DOE's commitment to the restoration program.

With regard to establishing separate funding for restoration work at the FEMP, DOE and Fluor Fernald currently manage funding for restoration work within accounts dedicated to Soil Remediation (i.e., SDFP). This has been an appropriate location for restoration funding due to the close relationship between Restoration and SDFP and the involvement of SDFP personnel (e.g., surveying, characterization, and construction) in supporting restoration work. Consistent with past understandings with the NRTs, remediation will take a higher priority than restoration if competition for funding occurs. To date, there have been several large restoration projects completed. Some have been at higher costs than originally planned in the baseline, with no impact to restoration work. DOE will maintain the current structure with regard to restoration funding and reemphasize our commitment to work closely with the NRTs should any issue regarding restoration funding occur in the future.

As reflected in the above proposal, DOE remains committed to the restoration program at the FEMP, and believes that the approach outlined above will allow for final restoration to be completed in an acceptable time frame, consistent with the expectations of the NRTs. DOE is extremely interested in pursuing the current Memorandum of Understanding quickly, finalizing the NRRP consistent with the schedule outlined above and the refined scope, and reaching final settlement of natural resource issues at the FEMP this calendar year. DOE requests the support of the NRTs in providing flexibility in the approach to restoration which will allow for development of the most efficient and cost-effective closure of the FEMP.

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Tom Schneider
Bill Kurey

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Any questions regarding this matter should be directed to Johnny Reising of my staff at
(513) 648-3161.

Sincerely,

Stephen H. McCracken
for Stephen H. McCracken
Director

FEMP:Reising

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Advocate ³⁶¹⁷

DOE Begins Work at Onsite Waste Management Facility, Plans Next Steps

Following years of planning, public debate and negotiations with regulatory agencies, work has begun at last on DOE's Environmental Management Waste Management Facility (EMWMF).

Bill Cahill, DOE's project manger for the waste facility, told the SSAB's Waste Management Committee recently that work is now underway at the East Bear Creek Valley site. Some road realignments have been made, he said, and work on the sedimentation ponds is in progress. Operation of the facility should begin in November.

ORSSAB has been actively tracking EMWMF since 1997 and has submitted comments on the facility to DOE five times during various stages of EMWMF's development. In 1998 the Board established a committee solely for the purpose of studying the concept, and EMWMF was the lead story of the November 1998 issue of the *Advocate* (available on the web at www.oakridge.doe.gov/em/ssab).

These days the Board's attention is focused not on facility design or siting but on the waste acceptance criteria (WAC) that will be used to determine what can and cannot be placed inside the "cell" as it is commonly called.

A partial answer to that question came in January when DOE released the *Attainment Plan for Risk/Toxicity-Based Waste Acceptance Criteria at the Oak Ridge Reservation, Oak Ridge, Tennessee* (DOE/OR/01-1909&D1), which identifies key processes, roles, and responsibilities for the WAC. The plan

discusses the framework DOE will use to:

- analyze and certify waste lots,
- establish acceptability of waste treatment processes over and above any needed to meet provisions,
- calculate WAC concentrations for new radionuclides or chemicals not currently identified in the waste inventory,
- determine acceptability of each waste lot for disposal,
- perform necessary waste treatment over and above any needed to meet provisions,
- schedule waste disposition,
- perform quality control measures, and
- prepare and maintain records.

The term "WAC" refers to a set of requirements that must be met for waste to be accepted for EMWMF disposal. They fall into three broad categories: administrative, analytic, and physical. The WAC Attainment Plan is meant to cover all aspects of meeting all three categories.

Administrative WAC are the requirements placed on waste acceptance as a result of legal agreements. These include restrictions such as that the EMWMF may only take in CERCLA wastes and that no free liquids or explosives may be accepted.

Analytic WAC are limitations on contaminant concentrations in a given waste form. The total load of contamination allowed must result in total risk below acceptable levels. Individual contaminants may exceed analytic WAC as long as the total waste load is within the risk level when the facility is full.

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SSAB Asks Agencies to Discuss Watershed Concept

ORSSAB has asked DOE, the Environmental Protection Agency, and the Tennessee Department of Environment and Conservation to explain why they appear to be backpedaling on the watershed cleanup approach to cleaning up contaminated areas of the Oak Ridge Reservation.

In comments the Board submitted to DOE on its recently released proposed plan for interim control actions in Upper East Fork Poplar Creek (UEFPC), the board reproached all three agencies for a "breakdown of the watershed approach that has been applied successfully to Bear Creek Valley, Melton Valley, and soon to Bethel Valley but appears to have met a roadblock with regard to UEFPC and the East Tennessee Technology Park."

According to the board's statement, the watershed approach permits consistent cleanup goals and standards for entire watersheds, optimizes remediation efforts and cleanup resources, and facilitates a coordinated technical approach and field implementation.

The board requested that each of the agencies "provide their specific reasons for not taking the watershed approach at UEFPC or the East Tennessee Technology Park" at the SSAB meeting on June 13, the transcript of which the board asks be included in the project's administrative record.

In addition to their concern with the limited scope of the proposed work, the board also took issue with the UEFPC plan for its lack of commitment to long-term stewardship of contaminated sites—a subject the group has been working on, both locally and nationally, for several years. Limiting the scope of the proposed plan could greatly complicate DOE's ability to define the long-term stewardship requirements for UEFPC.

The board's comments state that "Oak Ridge stakeholders cannot accept any decision that leaves waste material or residual contamination in place unless we can be assured that reliable measures are available to ensure that the remedy will remain protective of human health

and the environment for as long as the waste material or residual contamination remains a threat."

"Reliable long-term funding must be available because competent sustainable stewardship is impossible without financial support," the comments continue. "To that end, stewardship costs must be factored into the analysis and selection of remedial actions. It is difficult to believe that DOE can so completely ignore the elements of stewardship developed in partnership with representatives of the community."

In an effort to help DOE and the regulators make the UEFPC proposed plan and other documents more "stewardship friendly," the board included specific language it would like to see in all future proposed plans and records of decision. See page 4 for an abridged version of the comments. Complete text of the board's 11-page comment letter is available at its web site: www.oakridge.doe.gov/em/ssab.

Two ORSSAB Members Appointed to New Health Group

SSAB members Charles Washington and Bill Pardue have long resumes related to participation in Oak Ridge community organizations, and now they've added one more. Both men have been appointed to the Oak Ridge Reservation Health Effects Subcommittee (ORRHES), which held its first meeting in November.

ORRHES was chartered by the Agency for Toxic Substances and Disease Registry (ATSDR) and the Centers for Disease Control and Prevention to provide advice and recommendations concerning health activities and research conducted by the agencies. The committee's purposes are to



Charles Washington (left) and Bill Pardue during a break at the January 18 meeting of the Oak Ridge Reservation Health Effects Subcommittee.

(1) help prioritize public health issues and community concerns, (2) provide input in developing ATSDR's public

health assessment and community needs assessment, (3) provide input into follow-up public health activities, and (4) provide an opportunity for citizens to collaborate with agency staff and learn more about the public health assessment

process. Both Charles and Bill have retained their ORSSAB memberships and will serve on both groups.

DOE Begins Work on Waste Management Facility

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continued from page 1

Physical WAC are the physical limitations placed on waste forms. These include weight limits on containers, size limits on debris and limits on void spaces within the cell.

A key component of the WAC Attainment Plan is the WAC Attainment Board, which will be composed of representatives of DOE and the M&I contractor, with state and federal regulators serving in an oversight and advisory capacity. The board will serve several functions. It will (1) certify that the disposal applications are filled out

correctly; (2) review and concur with volume-weighted sum-of-fractions tracking; and (3) certify waste acceptance in accordance with administrative, analytic, and physical WAC. Bechtel Jacobs is responsible for computing the running calculations and submitting them to the WAC Attainment Board.

The SSAB's Waste Management Committee reviewed the WAC Attainment Plan and prepared comments, which went before the SSAB for approval at its March meeting. The committee has also prepared a long list of "information

needs" it has asked DOE to address so that the committee can consider further recommendations. This information will also help the committee create a set of materials it plans to distribute to the public to help stakeholders grasp some of the more complex issues involved in the WAC.

Next up for the committee will be to review regulator comments on the WAC Attainment Plan, which are due to DOE on March 22. According to Cahill, a D2 document will be transmitted to the regulators by May 23, and approval of the D2 is anticipated on June 22.

ORSSAB Members Visit Waste Storage Facilities

By Corkie Staley, ORSSAB Secretary

Seven members of the SSAB visited Envirocare of Utah, the Waste Isolation Pilot Plant (WIPP) in New Mexico, and the Nevada Test Site (NTS) and the Yucca Mountain Project in Nevada during the week of February 5-8.



ORSSAB members on tour at WIPP. Left to right: Scott Vouell, Kerry Trammel, Peery Shaffer, Avalon Mansfield, Corkie Staley, Shane Bellis.

waste storage at each of the facilities. Staff at each of the sites answered questions from the group and addressed concerns that were raised by the Board members.

Highlights of the trip included a tour of each of the sites, underground observation of operations at the WIPP and Yucca Mountain sites and bus tours of Envirocare and NTS.

Board members found this experience to be very educational and believe that the experience will better enable them to consider issues concerning the disposal and storage of waste generated at Oak Ridge.

Staff at each of the facilities presented site information, including history, environmental and geological data, safety, transportation, risk management, licensing, and financial issues.

The ORSSAB members were introduced to the current technologies and engineering techniques used for

Envirocare of Utah is a commercially operated facility, located 80 miles from Salt Lake City. Over 20 DOE sites, including Oak Ridge, send a variety of wastes for disposal there.

WIPP became the nation's first operating underground repository for

defense-generated transuranic waste in March 1999. Located in southeastern New Mexico, WIPP's disposal rooms are 2,150 feet (about one-half mile) underground in a salt formation.

NTS is a 1,350 square mile area, where around 800 underground and 100 above-ground tests of nuclear and conventional explosives were conducted from the 1950s to the 1990s.



Paul Larson of Envirocare (far right) explains facility operations to the ORSSAB group.

The Yucca Mountain Project is located within NTS and is being conducted to provide the basis for a national decision regarding the development of a repository for spent nuclear fuel and high-level waste.

Recent Recommendations and Comments

Following are abridged versions of recent ORSSAB recommendations and comments. Full text may be found on the web at www.oakridge.doe.gov/lem/ssab.

Comments on the Proposed Plan for Interim Source Control Actions for Contaminated Soils, Sediments, and Groundwater (Outfall 51) Which Contribute Mercury and PCB Contamination to Surface Water in the Upper East Fork Poplar Creek Characterization Area, Oak Ridge, Tennessee (DOE/OR/01-1839&D2)

This proposed plan identifies the preferred alternative for interim source control actions for remediation of mercury and PCB-contaminated media in Upper East Fork Poplar Creek (UEFPC), which encompasses the developed Y-12 Plant industrial area. The preferred alternative would limit releases at the sources. The SSAB Environmental Restoration and Stewardship committees reviewed the document and generated an 11-page set of comments, which the Board approved at its February 14 meeting.

ORSSAB is on record as supporting the watershed approach to remediation. We believe that a comprehensive watershed approach to remediation planning is more effective than the usual unit-by-unit approach. The watershed approach provides the public with a road map and schedule of proposed remediation activities, facilitates understanding and oversight of DOE's progress, and allows for comprehensive stewardship planning for the Oak Ridge Reservation (ORR).

Our review of the UEFPC Proposed Plan highlights what we believe are issues related to the breakdown of the watershed approach. These include the following issues:

- lack of an overall approach to cleanup levels and development of a range of cleanup criteria;

- lack of an implementation strategy for remedial actions,
- fragmentation of analysis,
- lack of an overall approach to stewardship, and
- lack of a satisfactory approach to and discussion of cumulative impacts.

Previous UEFPC documents presented a holistic approach to UEFPC remediation. Thus, it appears that with publication of the Proposed Plan, DOE, EPA Region 4, and the Tennessee Department of Environment and Conservation are renegeing on their commitment to a watershed strategy for the ORR. The SSAB is requesting from each of the parties an explanation of this decision. Specifically:

- Is this change from the watershed approach a conscious decision?
- If so, why wasn't the public notified and involved?
- If the decision just evolved (i.e., without formal documentation), we question if this is an appropriate way to run a CERCLA regulated remediation program.

We are requesting a public meeting with the parties to discuss and resolve these issues with regard to the watershed approach for UEFPC and the East Tennessee Technology Park.

General Comments on the Plan

More justification is needed for development and selection of a mercury (water) treatment technology that involves capturing mercury from a vent stream.

Air emissions from CERCLA projects fail to receive sufficiently rigorous evaluation to address all concerns that may be raised by personnel in proximity to remediation efforts.

Those responsible for stewardship and their roles must be determined.

Activities needed to ensure the integrity of remediation must be described. Accurate and durable information records regarding contamination risks and stewardship requirements must be readily available and accessible. And, reliable long-term funding must be available because competent sustainable stewardship is impossible without financial support. To that end, stewardship costs must be factored into the analysis and selection of remedial actions.

We expect to see a section devoted to discussion of stewardship accompanied by a table that outlines stewardship requirements for the three alternatives.

We believe that better organization of the stewardship/land use control (LUC) issues would result in a more acceptable document especially since it is stated in several places that all alternatives rely on LUCs for protection of potential human receptors within the UEFPC Characterization Area (CA).

We expect to see the LUCs and stewardship elements included in the discussion and tables for the three alternatives in sufficient detail to support a reasoned evaluation of the LUCs and stewardship in the remedy proposal and selection process. A more complete discussion must be provided for the preferred alternative.

The discussion of the preferred alternative must, at a minimum, include the strategies set out in the ORR LUC Assurance Plan (LUCAP). In addition, there must be mention of the 5-year review, the annual Remediation Effectiveness Report, the availability and location of data/reports/CERCLA and post-Record of Decision (ROD) documents.

There must be a commitment to public participation in post-ROD activities

Recent Recommendations and Comments

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and review of post-ROD documents. This is missing in the EPA policy "Assuring Land Use Controls at Federal Facilities" and the ORR LUCAP.

We recommend that the "Commitment to Stewardship" section of this document and all other proposed plans and RODs include the following statement:

Radioactive and hazardous contaminants will remain in the UEFPD CA following the remedial actions described in the proposed plan and subsequent ROD. These residuals will require monitoring, maintenance of containment structures and other land use controls, and restriction of access for ___ years, to protect the public's health and the environment. The implementation and funding of these activities is acknowledged to be the responsibility of the federal government, through its designated contractors or agents, until the hazards and risk are negligible. The federal government will provide for public involvement in the oversight of stewardship and land use control activities by supporting a citizens group and by ensuring public input to all CERCLA documents and subsequent reviews of contaminated areas until the site is suitable for unrestricted use.

Comments on the Draft Long-Term Stewardship Study of October 2000

DOE prepared this study in accordance with the terms of a 1998 settlement agreement that resolved a lawsuit brought against DOE by the Natural Resources Defense Council and other plaintiffs. The draft study examines the institutional and programmatic issues facing DOE as it completes the environmental cleanup program at its sites. The following comments were prepared by the ORSSAB Stewardship

Committee and approved by the Board at its December 13, 2000, meeting.

This report is an excellent effort to illuminate the large issues for DOE Long-Term Stewardship (LTS) and to indicate the available broad policy directions. We did not detect a major point that is not covered somewhere at least by implication. A few ideas, however, were treated too lightly or indirectly to command the future attention they deserve.

Citizen requests for better LTS coverage in Proposed Plans and Records of Decision (RODs) are dismissed on pages 15 and 17 in Section 3.2 with an argument based on a flawed statement of the request. Nobody expects a detailed stewardship plan in a ROD that would locate signs, fenceposts, the exact width of buffer zones, or list the botanical and biological species that will be monitored forever. Yet the impossibility of including such detail has been given as the reason for not including meaningful stewardship discussions in the crucial decision documents that describe the whole remediation strategy for an area (i.e., Proposed Plans and RODs). How can stewardship be considered in remedy selection (as suggested on page 16) if these documents do not clearly commit to maintaining a level of remediation through time that is sufficient to achieve the chosen Remedial Action Objectives? We believe that a post-ROD document, to which the public has no formal input, is no place to be defining high level goals for long-term stewardship as is suggested near the end of page 17.

On page 41 and Exhibit 5-1, the authors of the Study acknowledge that persons outside the originally contaminated area are protected from hazards primarily by "engineering controls" designed to stabilize the contaminants, rather than by "institutional controls"

that keep people away from hazards. However, the rest of the report dwells far too much on the latter type of remedy. Unless contaminated properties are transferred to owners who prove to be complacent and uncooperative, the engineering controls and their maintenance will be the more important for DOE sites. Where hazardous contamination will be left in place at weapons sites, engineered physical controls will be added; storms and floods are bound to challenge the halfway measures that must be used to control contaminant transport. We believe the Study should emphasize LTS for "engineering controls."

On page 48 the authors indicate the possible uselessness of land use control measures such as deed restrictions. The paper of Mary English, your Reference 49, indicates that easements and other deed restrictions have been found to fail over time unless the owner that originates the restrictions (here usually the federal government) consistently enforces the restrictions in the civil courts. This finding is very important, and suggests a strong and difficult condition for the usefulness of deed restrictions. This consistent enforcement caveat needs emphasis.

Please mention the significance of cost inflation to the considerations involving trust funds in Section 8. The trust described in Exhibit 8-5 can succeed only if the terms of agreement are broadly interpreted to include using a portion of the trust income to increment the principal.

The importance of continuing local public involvement for effective LTS is introduced on page 91. We would go farther. We think some sort of citizen stewardship board will be needed at the highly contaminated sites.

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Membership News

Several changes have taken place in membership recently, and a recruitment drive is currently underway.

Five members of the Board (Robert Blaum, Tami Hamby, Demetra Nelson, Darrell Srdoc, and Rikki Traylor) resigned in the past few months due to career and family commitments. DOE appointed three replacements in December (John Kennerly, John Million, and Kevin Shaw), drawn from the pool of potential membership candidates who were recommended by the independent screening panel.

To bring the SSAB back up to its 20-member limit and replenish the candidate pool, a recruitment drive, which ends on March 30, is currently underway (see ad below for details). Following are brief biographies of the ORSSAB members appointed in December.

John Kennerly is a retired chemical engineer who worked for Lockheed Martin Energy Systems. He has broad experience in diverse environmental

management technology areas, such as environmental restoration, waste management, D&D, permitting, planning, and cost estimating. He also has experience in process development and design and other areas of technology. He is a member of the Sierra Club, the American Institute of Chemical Engineers, the American Society of Testing and Materials, the Tennessee Ornithological Society, the Board of Directors for Tennessee Wesleyan College, and the program advisory committee for the yearly Waste Management Conference. John is a Knoxville resident.

John Million is retired chemist who worked at the K-25 site, now known as the East Tennessee Technology Park. A resident of Oak Ridge since 1957, John has a high interest in the well-being of the community. He is a member of the Woodland Neighborhood Association, which is in close proximity to the Oak Ridge Y-12 Plant.

Kevin Shaw served through February but then resigned when he accepted a

position at Brookhaven National Laboratory in New York. John has a background as an environmental scientist for Bechtel Environmental, Inc., with an M.S. degree in biological sciences, over 25 years experience in environmental science, and service on several committees overseas that reviewed environmental policy. He hopes to continue his interest in DOE remediation activities at his new location on Long Island.

Demetra Nelson, Rikki Traylor Honored for Service to Board

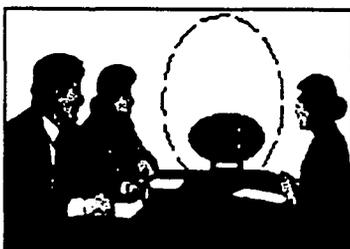
On February 14, Rod Nelson, Assistant Manager for Environmental Management, presented service awards to Demetra Nelson (top photo) and Rikki Traylor (bottom photo), who had recently left the Board after long periods of distinguished service. Demetra had served on the Board since June 1997. She was a committee leader in 1999 and ORSSAB Vice Chair in FYs 2000 and 2001. Rikki joined the Board in August 1995 as a charter member. She served as both a committee leader and Board Secretary in FYs 1999 and 2000. The Board thanks Demetra and Rikki for their significant contributions to the SSAB.



This Seat Could Be Yours!

INTERESTED?

The Oak Ridge Site Specific Advisory Board (ORSSAB) is seeking volunteers to fill current and future Board vacancies. If you are interested in joining ORSSAB or would like to learn more about Board membership, call (865) 241-3665 or visit the ORSSAB home page on the web at <http://www.oakridge.doe.gov/em/ssab>. The deadline for submitting applications is March 30, 2001.



ORSSAB is an independent citizens panel advising the U.S. Department of Energy on environmental management issues on the Oak Ridge Reservation. Membership on the Board reflects the diversity of communities surrounding the reservation and includes a balance of technical and non-technical representatives.

Reservation News

NIOSH Report Recommends Comprehensive Worker Information System

A recently released report by the National Institute for Occupational Safety and Health (NIOSH) recommends that a comprehensive worker information system be established to better study the relationship between occupational exposures and worker health problems.

"At the present time, the necessary information to conduct epidemiologic, exposure assessment, or hazard surveillance studies on remediation workers is not available," the report states.

The report addresses whether records currently collected by DOE sites allow accurate identification of remediation workers and their exposure, work history, and medical information. Several problems were noted in trying to evaluate this information, such as incomplete rosters of workers and gaps in exposures and work history. Oak Ridge was one of several DOE sites studied.

The recommended system would include each worker who has participated in site remediation efforts, whether as an employee of DOE, a prime contractor, or a subcontractor.

"Potential benefits," the report says, "of DOE implementing a comprehensive remediation worker information system include an enhanced ability to limit worker risk, as well as better understanding of exposure-disease relationships. Recent attention to compensation issues highlights the value of being able to identify workers engaged in particular activities or with specific exposure potentials."

Copies of the final summary report are available by calling 1-800-356-4674.

DOE, TDEC Release Annual Reports for FY 2000

Two summary documents have been released recently detailing the state of environmental management activities on the Oak Ridge Reservation.

DOE's *Federal Facility Agreement Annual Progress Report for Fiscal Year 2000* (DOE/OR/01-1927&D1), offers descriptions, FY 2000 accomplishments, issues, and FY 2001 plans for 33 remediation projects at the East Tennessee Technology Park, the Y-12 Plant and Oak Ridge National Laboratory. It also provides a description of the public involvement activities of DOE's Environmental Management Program and a list of program contractors. Copies are available at the DOE Information Resource Center, 105 Broadway, Oak Ridge (865-241-4582).

The Tennessee Department of Environment and Conservation (TDEC) *Status Report to the Public* describes the activities of the five program sections of the TDEC DOE Oversight Division. Like DOE's annual, this document also provides general overview information. The substance of the report, though, is found in Chapters 4, 5 and 6, which describe the Oak Ridge regional environment, key challenges, and health studies, respectively. Copies are available at the DOE Information Resource Center and the DOE Reading Room. Review copies may be found at the public libraries in Clinton, Dayton, Kingston, Knoxville, Loudon County, Meigs County, Oak Ridge, and Wartburg. The report is also available on TDEC's web site at www.state.tn.us/environment/doeo/intro.htm.

State Denies DOE Request to Store Wastes at Reservation

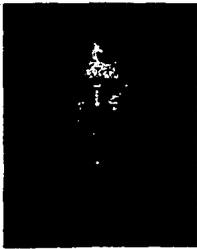
In February, the state of Tennessee rejected a request from DOE to temporarily store transuranic wastes from Battelle Laboratories in Ohio before shipping them to the Waste Isolation Pilot Plant in New Mexico.

In a letter addressed to DOE's Carlsbad, New Mexico, office, Governor Sundquist stated that "Oak Ridge is shown as a potential destination for three shipments from Battelle Columbus beginning in March 2001. This is not an option. Tennessee will not become an interim radioactive waste storage facility for the DOE Complex."

The letter also states that "...the State will consider treatment and packaging of out-of-state Transuranic Waste on a case-by-case basis after the Oak Ridge TRU (Transuranic Waste) Processing Facility is operational, and Oak Ridge Waste is routinely shipped to WIPP."

Foster Wheeler Corporation, which is constructing the Transuranic Waste Processing Facility, held a groundbreaking ceremony for the facility in January. With operations expected to begin in late 2002 and shipments to WIPP to follow soon after, the likelihood of the Ohio wastes staying on the Oak Ridge site for many months was good. Oak Ridge wastes were approved for acceptance at WIPP last year after several years of discussion between the states and DOE.

Report from the National SSAB Chairs' Meeting



By Luther Gibson,
ORSSAB Chair

Twice yearly the Chairs of the SSABs meet to discuss DOE EM projects and policy. The recent meeting, hosted by the Community Advisory Board for Nevada Test Site

Programs, was held February 8-10 in Las Vegas. The meeting began with an optional tour of the Nevada Test Site and the Yucca Mountain Project on February 8 and continued with meetings on the following two days.

Peery Shaffer, Corkie Staley, Charles Washington, and I participated in the meetings, which focused on board process issues: work plans and agendas, new member recruitment, public outreach, committee structure, and development of recommendations.

At the "round robin" icebreaker on Friday morning, February 9, chairs introduced participants from their boards and discussed three issues of current concern to their boards. The issues we raised were alternatives to incineration, the on-site CERCLA disposal cell, and stewardship.

Discussion continued on process topics. Most boards were more directly involved in selection of members than is Oak Ridge. Many boards vote directly to recommend individuals to fill designated Board openings. An advantage of our independent membership selection process is more time available for work on issues.

Most of the boards conduct annual or more frequent retreats and seek input from DOE, EPA, and state regulators. Most also have an executive committee or equivalent body that sets agendas.

Without exception, the boards agreed that effective committees were the key to developing recommendations and advice. The ORSSAB Stewardship Committee was undoubtedly the best example of open participation by the public in committee work.

Most boards reported only marginal results from their public outreach programs. Videotaping and broadcast of meetings on local cable television were unique to Oak Ridge.

Formality of evaluations varies among boards. Rocky Flats has the most formal process, using a 10-page form. Idaho does a "plus and delta" oral evaluation at end of each meeting. We reported that our annual report provides a quick overview of activities and accomplishments, and discussion of the previous year's progress is held at our annual planning retreat.

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