



## Department of Energy

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



**3741**

JUN 18 2001

Mr. Gene Jablonowski  
United States Environmental Protection Agency  
Region V, SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0666-01

Mr. Tom Schneider  
Ohio Environmental Protection Agency  
401 East Fifth Street  
Dayton, Ohio 45402-2911

Dear Mr. Jablonowski and Mr. Schneider:

### SILOS PROJECTS REGULATORY MILESTONE STRATEGY

- References:
1. Letter DOE-0283-00, J. Reising to G. Jablonowski and T. Schneider, "Revised Silos 1 and 2 Accelerated Waste Retrieval Project Regulatory Deliverables Schedule," dated January 25, 2000
  2. Letter DOE-0371-01, J. Reising to G. Jablonowski and T. Schneider, "Draft Remedial Action Work Plan for Radon Control System Phase 1 Operations," dated March 1, 2001
  3. Letter, G. Jablonowski to J. Reising, "Disapproval of Draft Remedial Action Work Plan for Radon Control System (RCS) Phase 1 Operation," dated May 1, 2001
  4. Letter, T. Schneider to J. Reising, "Comments - Draft Remedial Action Work Plan for Radon Control System (RCS) Phase 1 Operation," dated April 30, 2001
  5. Letter DOE-0615-01, J. Reising to G. Jablonowski and T. Schneider, "Request for Extension for Response to Comments on Draft Remedial Action Work Plan for Radon Control System Phase 1 Operation," dated May 30, 2001

Mr. Gene Jablonowski  
Mr. Tom Schneider

-2-

6. Letter, G. Jablonowski to J. Reising, "Approval of Silo 3 Project Remedial Design Deliverables Schedule," dated April 13, 1999
7. Letter, G. Jablonowski to J. Reising, "Silo 3 Extension Request," dated April 23, 2001
8. Letter DOE-0394-01, J. Reising to G. Jablonowski and T. Schneider, "Request for Extension of Silo 3 Amended Consent Agreement Milestone," dated April 16, 2001
9. Letter DOE-0981-00, J. Reising to G. Jablonowski and T. Schneider, "Remedial Design Work Plan for the Operable Unit 4 Silos 1 and 2 Project," dated September 6, 2000

During recent discussions, the Department of Energy (DOE) has briefed the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) on the current status and planned path forward for the Silos 1 and 2, Silo 3, and Silos 1 and 2 Accelerated Waste Retrieval (AWR) Projects. As we have discussed, the execution approaches and associated schedules for all three projects will be finalized in the Closure Contract baseline. DOE's goal is to finalize and approve the revised baseline by October 1, 2001. This baseline will impact existing, approved milestones and regulatory deliverables (e.g., Remedial Design (RD) Work Plans and RD Packages), and will also impact future deliverables for all three projects. The purpose of this letter is to propose for your approval a strategy for establishment of appropriate milestones for the Silos 1 and 2, Silo 3, and Silos 1 and 2 Accelerated Waste Retrieval (AWR) Projects consistent with the revised baseline.

### PROPOSED MILESTONES

DOE proposes the following milestones for Silos Projects activities:

Submit revised Remedial Action Work Plan (RAWP) for RCS Phase 1 Operations	June 20, 2001 (existing milestone)
Submit revised Silos 1 and 2 AWR Project RD/RA schedule proposing milestones for:	October 1, 2001
Submittal of revised RD documentation	
Initiation of RCS Phase 1 operations	
Initiation of FSM Testing	
Submittal of RAWP for Waste Retrieval Operations	

3741

JUN 18 2001

Mr. Gene Jablonowski  
Mr. Tom Schneider

-3-

DOE-0666-01

Submit revised Silo 3 RD Deliverables Schedule,  
proposing :

July 15, 2001

- Date for submittal of Silo 3  
RAWP(existing milestone)
- Scope of necessary revisions to RD  
Documentation
- Date for submittal of revised Silo 3 RD  
documentation

Submit revised Silos 1 and 2 RD Work Plan,  
proposing milestones for:

October 1, 2001

- Submittal of RD Package
- Submittal of RA Work Plan

#### **BASIS FOR PROPOSED MILESTONES**

The following information provides the basis of DOE's proposed milestones.

##### Silos 1 and 2 AWR Project

Reference 1 established dates for submittal of RD and Remedial Action (RA) documentation for the AWR Project. The only remaining milestone from Reference 1 is for submittal of the RAWP for Waste Retrieval Operations by August 30, 2002. In Reference 2, DOE proposed milestones for initiation of Radon Control System (RCS) Phase 1 Operations and for initiation of Full Scale Mockup (FSM) testing. In comments on those milestones (References 3 and 4), both the USEPA and OEPA recommended re-evaluation of the milestones for the AWR Project. DOE provided notice of extension of the date for response to those comments (Reference 5) so that new dates may be proposed consistent with discussion of an appropriate milestone strategy with USEPA and OEPA.

As we have discussed, contract transition and due diligence evaluations are currently in process evaluating key aspects of the AWR design, operability issues such as the use of the EMMA™ arm, the necessary scope of FSM testing, and re-evaluation of the construction schedule to expedite completion of RCS construction. The results of these re-evaluations will require some degree of revision of the RD Package, which has been conditionally approved by both the USEPA and OEPA. The extent of these revisions will be defined based upon the results of the transition and due diligence evaluations. Since the extent of the revisions required to the current RD Package is not yet defined, DOE requests that USEPA not finalize its approval of the AWR Project RD Package at this time.

Mr. Gene Jablonowski  
Mr. Tom Schneider

-4-

3741

JUN 18 2001

DOE-0666-01

The revised baseline schedule for completion of the AWR Project will be finalized based upon the results of the contract transition and due diligence evaluations. The schedule for submittal of revised RD Package documentation, as well as revised milestones for initiation of RCS Phase 1 operations, initiation of FSM, and submittal of Waste Retrieval RAWP will be identified based upon the revised baseline schedule. This proposal will be documented in the revised draft RAWP for RCS Phase 1 Operations, to be submitted to USEPA and OEPA by June 20, 2001 in accordance with Reference 5.

### Silo 3 Project

Reference 6 established a milestone of May 1, 2001 for the submittal of a draft RAWP for the Silo 3 Project to USEPA and OEPA for review. Reference 7 approved DOE's request (Reference 8) that the May 1, 2001 milestone be extended, and that the milestone date for submittal of the RAWP to the USEPA and OEPA be established by July 15, 2001 (date for the date).

Re-evaluation of the technical approach and schedule for implementation of the Silo 3 Project was initiated following the termination of the contract between DOE's Prime Contractor, Fluor Fernald, Inc. and Rocky Mountain Remediation Services (RMRS). Based upon the results of this re-evaluation, a RD Deliverables Schedule will be developed proposing dates for submittal of revised RD documentation, and the RAWP.

The schedule for the Silo 3 Project will potentially be impacted by final sitewide funding allocation required to address impacts such as those due to AWR Project contract transition. In order to effectively utilize available shared resources, and to maintain priority on the RCS and Silos 1 and 2 waste retrieval, funding reallocation may be required to address the funding impacts of the AWR contract transition. These funding impacts will be quantified through the due diligence process. Any impact of necessary funding reallocation on the schedule of projects such as the Silo 3 Project will not be finalized until completion of the baseline review and approval process. The Silo 3 Project schedule may also be impacted by resolution of technical issues identified during conceptual design.

It should be recognized that impacts of the technical and funding issues discussed above may require subsequent re-evaluation, and request for extension of the submittal dates proposed in the RD Deliverables Schedule.

### Silos 1 and 2 Full Scale Remediation Project

Reference 9 provided approval of the strategy for preparation and submittal of RD documentation for the Silos 1 and 2 Full Scale Remediation Project. This strategy, and the associated milestones, assumed an execution approach involving award of a turnkey subcontract for design, construction, and operation of the facility. Milestones were

3741

JUN 18 2001

DOE-0666-01

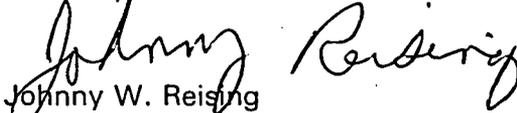
Mr. Gene Jablonowski  
Mr. Tom Schneider

-5-

established for award of the contract (October 12, 2002) and for submittal of a RD Deliverables Schedule (120 days after contract award). The revised baseline for the Silos 1 and 2 Full Scale Remediation assumes a Fluor Fernald, Inc.-directed execution approach. The revised baseline will specify the scope and schedule for preparation of RD and RA documentation based upon this approach. A revised Silos 1 and 2 RD Work Plan will be prepared documenting the RD strategy under the new execution approach, and proposing the associated milestones.

The enclosed table summarizes the current and to-be-established milestones and the strategy proposed in this letter. If there are any questions, please contact me at (513) 648-3139.

Sincerely,

  
Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Akgündüz

Enclosures

cc w/enclosures:

K. Chaney, EM-31/CLOV  
S. Fauver, EM-31/CLOV  
N. Akgündüz, OH/FEMP  
T. Schneider, OEPA-Dayton (three copies of enclosures)  
F. Hodge, TetraTech  
M. Schupe, HSI GeoTrans  
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

A. Murphy, OH/FEMP  
A. Tanner, OH/FEMP  
J. Saric, USEPA  
R. Vandegrift, ODH  
S. Beckman, Fluor Fernald, Inc./MS52-4  
D. Carr, Fluor Fernald, Inc./MS2  
R. Fellman, Fluor Fernald, Inc./MS52-4  
T. Hagen, Fluor Fernald, Inc./MS65-2  
S. Hinnefeld, Fluor Fernald, Inc./MS52-2  
D. Nixon, Fluor Fernald, Inc./MS52-4  
T. Walsh, Fluor Fernald, Inc./MS46  
ECDC, Fluor Fernald, Inc./MS52-7

5

3741

**SILOS PROJECTS  
REGULATORY DELIVERABLE / MILESTONE STRATEGY**

<b>DELIVERABLE / ACTIVITY</b>	<b>CURRENT MILESTONE</b>	<b>PROPOSED MILESTONE / STRATEGY</b>
<b>AWR</b>		
<b>Existing Milestones</b>		
Revised RCS RA Work Plan	6/20/01	Submit revised RAWP by 6/20/01; commit to proposing revised RD/RA milestones by 10/1/01
Submit RA Work Plan for Waste Retrieval	8/30/02	Propose revised milestone by 10/1/01
<b>Milestones to be Established</b>		
Submit RD Package Revisions	TBD	Propose date by 10/1/01
Initiate RCS Phase 1 operations (draft RCS RA Work Plan) proposed 6/1/02)	TBD	Propose milestone by 10/1/01
Initiate FSM testing (draft RCS RA Work Plan) proposed 8/1/02)	TBD	Propose milestone by 10/1/01
Initiate waste retrieval	TBD	To be established in RA Work Plan for Waste Retrieval
<b>SILO 3</b>		
<b>Existing Milestones</b>		
Establish schedule for submittal of RA Work Plan	7/15/01	Propose RAWP submittal date by 7/15/01
<b>Milestones to be Established</b>		
Submit Revised RD Package	TBD	Propose scope and schedule for revision of RD documentation in revised RD Deliverables Schedule, submitted by 7/15/01
Initiate operations	TBD	To be established in RA Work Plan
<b>SILOS 1 AND 2 FULL-SCALE REMEDIATION</b>		
<b>Existing Milestones</b>		
Submit RD Deliverables Schedule	120 days after contract award (equates to Feb 2003)	Submit revised RD Work Plan by 10/01/01, specifying scope and milestones for RD/RA deliverables
<b>Milestones to be Established</b>		
Submit RD Package	TBD	Establish in revised RD Work Plan
Submit RA Work Plan	TBD	Establish in revised RD Work Plan
RA Milestones	TBD	To be established in RA Work Plan

6