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**Ohio Field Office**  
**Fernald Environmental Management Project**  
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Mr. Gene Jablonowski, Remedial Project Manager  
United States Environmental Protection Agency  
Region V, SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0054-03

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

Dear Mr. Jablonowski and Mr. Schneider:

**IMPENDING OPERATION OF THE RADON CONTROL SYSTEM FOR THE SILOS 1 AND 2,  
ACCELERATED WASTE RETRIEVAL PROJECT**

During our telephone call of October 23, 2002, the Department of Energy (DOE), Ohio Environmental Protection Agency (OEPA), and Fluor Fernald representatives exchanged views on the impending operation of the Radon Control System (RCS) for the Silos 1 and 2, Accelerated Waste Retrieval (AWR) project. There were points both of agreement and disagreement between OEPA and the Fernald teams.

In DOE's responses to the OEPA comments on the Remedial Action Work Plan (RAWP), and in other documents, the project defined intermittent operation of the RCS. Intermittent operation of the RCS was defined as the performance of a "Hot Test" followed by operation to control radiological exposures to construction workers. These workers would be working within the exclusion area, working in the vicinity of the silo domes and working to extract, remove, and transfer the waste materials from the silos to the temporary storage tanks and to treatment. The project's concept for intermittent operation also included potentially lengthy periods of time when the RCS would not be in operation. This downtime would occur when construction (and operation) activities would not be required in the areas and on the activities defined above.

While the OEPA expressed agreement with the project's need to conduct a Hot Test as the first step in the operation of the RCS, the OEPA expressed concern that the project's plan for operation after completion of the Hot Test was not consistent with OEPA expectations. The OEPA's concern centers on the non-continuous nature of the proposed, "post-Hot Test" operation.

Mr. Gene Jablonowski  
Mr. Tom Schneider

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The project's position is that it is premature to identify a date for continuous operation given the operational uncertainties extant at present, but which will be reduced or eliminated by the Hot Test.

The OEPA acknowledged the significance of these uncertainties and proposed that DOE identify a date when the project would be able to identify a future, second date whereupon continuous operation would be technically feasible.

Thus, conformal with these discussions, and assuming that the Hot Test commences on November 1, 2002, March 15, 2003 is the date by which time the project will identify to the OEPA a future date when continuous operation is technically demonstrable and will commence.

I believe that this commitment accurately captures the agreements of our discussions and that the submittal of this letter will provide sufficient clarification of the project's position for the OEPA to approve the RAWP and therefore, the initiation of operation of the RCS.

If you have any questions, please contact Nina Akgunduz at (513) 648-3110.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Hall

cc:

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T. Schneider, OEPA-Dayton (three copies of enclosure)  
M. Cullerton, Tetra Tech  
M. Shupe, HSI GeoTrans  
R. Vandegrift, ODH  
D. Carr, Fluor Fernald, Inc./MS2  
R. Corradi, Fluor Fernald, Inc./MS52-4  
R. Fellman, Fluor Fernald, Inc./MS52-4  
T. Hagen, Fluor Fernald, Inc./MS9  
S. Hinnefeld, Fluor Fernald, Inc./MS52-2  
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T. Walsh, Fluor Fernald, Inc./MS52-3  
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