4601

Beckman, Stephen

From: Beckman, Stephen
Sent: Thursday, October 10, 2002 1:09 PM
To: 'Bill Lohner'
Cc: Kelly Kaletsky; Tom Schneider; Jablonowski.Eugene@epamail.epa.gov; nina_akgunduz@fernald.gov; Jewett, Marc; Previty, William; Hall, John S; Corradi, Ray
Subject: RE: OEPA Comment RCS Valve Assembly Installation Overview

RCSValveInstallOEPACOMMENTresp...

Bill,

Responses to your comments are attached, consistent with our conference call on 10/8. A revised workplan reflecting the isolation valves, and including the DCN adding the isolation valves to the valve assemblies, will be faxed up either this afternoon, or first thing Monday.

give me a call if there are any questions.

steve b.

-----Original Message-----
From: Bill Lohner [mailto:Bill.Lohner@epa.state.oh.us]
Sent: Wednesday, October 02, 2002 11:30 AM
To: nina_akgunduz@fernald.gov; Stephen.Beckman@fernald.gov
Cc: Kelly Kaletsky; Tom Schneider; Jablonowski.Eugene@epamail.epa.gov; Mark@geotransinc.com
Subject: OEPA Comment RCS Valve Assembly Installation Overview

Nina,

Comments attached.

4601

FLUOR FERNALD, INC.

Silos Project
P.O. Box 538704
Cincinnati, OH 45253-8704
Fax: 513/648-4900

The following fax transmission will consist of 23 *page(s), including cover sheet.*

TO: Tom Schneider DATE: 10/14/02

FAX #: 937 285 6404 COMPANY:

FROM: Steve Beckman

MESSAGE:

Tom,

Attached is the revised RCS Valve installation overview, incorporating the comment responses we e-mailed you & Bill last week.

Current schedule is to start installation 10/16.

Steve Beckman

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FLUOR FERNALD, INC.

Silos Project
P.O. Box 538704
Cincinnati, OH 45253-8704
Fax: 513/648-4900

The following fax transmission will consist of 23 *page(s), including cover sheet.*

TO: Gene Jablonowski **DATE:** 10/14/02

FAX #: 312 353 8426 **COMPANY:**

FROM: Steve Beckman

MESSAGE:

Gene - FYI,
Revised ECS valve installation overview - incorporating add'n of the isolation valve,
Schedule is to start installation 10/16

Steve Beckman

RESPONSE TO OHIO EPA COMMENTS
Radon Control System (RCS) Valve Assembly Installation Overview

1. Comment: Ohio EPA should be included in the notifications section (3.7) prior to breaching the silos headspace. A tentative schedule for valve installation should also be included in this document.
   Response: The current schedule calls for installation of the valves beginning on approximately October 15, 2002. Notification of Ohio EPA at least 24 hours in advance the valve installation process is specified as a prerequisite in the Traveler Package used to direct the field activities.
   Action: Notify Ohio EPA and U.S. EPA at least 24 hours prior to initiating the installation of the valve assemblies on the Silos.

2. Comment: The document provides inadequate detail on the pressure control valves. Ohio EPA is concerned that after installation the relief valve may be actuated due to ambient conditions causing an unplanned release from the silos headspace. This issue needs to be addressed before installation.
   Response: Equipment data sheets for the relief valves are attached to this comment response. The valves will be tested and verified to be in proper condition prior to installation on the silos. As was discussed with the OEPA during our conference call on October 8, 2002, the design has been modified to include an isolation valve between the silo manways and the relief valves. This isolation valve will be closed, isolating the relief valve from the Silo headspace, when the RCS is not in operation.
   Action. The Radon Control System (RCS) Valve Assembly Installation Overview has been revised to include: 1) Design Change Notice DCN 40710-JEG-250 which incorporates the isolation valves into the piping design, and 2) revised installation steps to reflect installation of the isolation valves, and to specify closing the valves until operation of the RCS is initiated. The requirement to isolate the relief valves whenever the RCS is not operating will be reflected in the RCS Phase 1 RA Workplan.

3. The relief valves will be installed well in advance of RCS operation. Per DCN 40710-JEG-014 these valves are to be monitored for radon emissions. This document does not address monitoring of relief valve emissions.
   Response: The instrumentation identified in the referenced DCN (relief valve position indicators and headspace pressure and radon concentration monitoring) will provide indication of relief valve opening and quantify any radon release after the startup of RCS Phase operation, currently scheduled for November 1, 2002.