



Department of Energy
Ohio Field Office
Fernald Environmental Management Project
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APR 18 2003

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

DOE-0343-03

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

Dear Mr. Jablonowski and Mr. Schneider:

AMENDMENT TO OPERABLE UNIT 3 INTEGRATED REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN REGULATORY MILESTONES

The purpose of this letter is to submit to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) proposed revisions to the regulatory milestones contained in the Operable Unit 3 (OU3) Remedial Design/Remedial Action (RD/RA) Work Plan. Pursuant to Section XVIII (A)(1)(2) of the Amended Consent Agreement (ACA), enclosed with this letter are amended pages of the OU3 Integrated RD/RA Work Plan (in yellow), which contain the revised Remedial Design Regulatory Milestones (Table 6-1) and the revised Schedule (Figure 6-1). The enclosed amendment to Table 6-1 of the OU3 Integrated RD/RA Work Plan incorporates revised implementation plan submittal dates for the Operable Unit 4 (OU4) Complex Decontamination and Dismantlement (D&D) Project.

The D&D of the OU4 Complex Phase I (i.e., concrete silo structures) is currently scheduled to be conducted in the same time frame as the D&D of OU4 Complex Phase II (i.e., Radon Control System, Transfer Tank Area, Silo Treatment Building and associated infrastructure). Since these D&D projects are scheduled in the same timeframe, the Department of Energy, Fernald Closure Project (DOE-FCP) requests that the OU4 Complex Phase I and OU4 Complex Phase II be combined as a single OU4 Complex D&D Project, including all related milestones and deliverables.

APR 18 2003

Mr. Gene Jablonowski
Mr. Tom Schneider

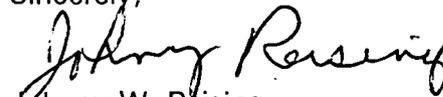
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DOE-0343-03

The current Implementation Plan submittal date regulatory milestone for the OU4 Complex Phase I D&D Project is identified in Table 6-1 as July 3, 2003. However, OU4 Complex completion of construction activities is scheduled to occur in November 2003. Development of the OU4 Complex D&D Implementation Plan prior to completion of construction activities would not provide accurate or adequate details. Therefore, in order to finalize evaluations relating to the OU4 Complex D&D or engineering issues, an additional six months after completion of construction is being requested for submittal of the D&D Implementation Plan. This would allow adequate time to prepare the OU4 Complex D&D Implementation Plan and allow time for sufficient review and approval by the regulators. DOE-FCP believes that in accordance with the Amended Consent Agreement Section XVIII (C)(2), "good cause" exists to extend the implementation plan submittal date regulatory milestone for the OU4 Complex D&D Project to May 28, 2004.

If there are any questions concerning this subject, please contact Melvin Boyd at (513) 648-3412 or John Trygier at (513) 648-3154.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FCP:Boyd

Enclosure: As Stated

cc w/enclosure:

J. McCloskey, EM-31/CLOV
M. Boyd, OH/FCP
J. Trygier, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
J. Saric, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
B. Edmondson, Fluor Fernald, Inc./MS52-0
M. Jewett, Fluor Fernald, Inc./MS52-5
R. Nichols, Fluor Fernald, Inc./MS7
M. Stevens, Fluor Fernald, Inc./MS87
ECDC, Fluor Fernald, Inc./MS52-7

OPERABLE UNIT 3

INTEGRATED REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN



INFORMATION
ONLY

SECTIONS 1-7, APPENDICES A through F

APRIL 2003

FERNALD CLOSURE PROJECT
FERNALD, OHIO

U. S. DEPARTMENT OF ENERGY
FERNALD AREA OFFICE

FINAL

Document Control No. 2503-WP-0023 (REV. 0) PCN6

RECORD OF REVISIONS

OPERABLE UNIT 3 REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN

2503-WP-0023, REV. 0

REVISION	PCN	DATE	PURPOSE
0	N/A	June 1997	Initial issuance of Revision 0 <i>Operable Unit 3 Integrated Remedial Design/Remedial Action Work Plan</i> (2503-WP-0023)
0	1	March 1998	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4 and pp.6-7/6-8.
0	2	July 1998	Amendment to OU3 Integrated RD/RA Work Plan for placement of transite panels in the OSDF; p.3-60. (to reflect that transite panels will not be size reduced before disposal in the OSDF and to clarify the fact that transite panels will generally be packaged in 1.5-foot bundles, but those bundles may be stacked to a maximum height of four feet if desired by the OSDF contractor.
0	3	December 1998	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4 and 6-7/6-8 (resulting from Plant 1 Pad Consolidation Change Proposal).
0	4	June 1999	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp 6-3/6-4 and 6-7/6-8 (resulting from Nuclear Materials Dispositioning Milestones/Extension, USEPA letter dated June 9, 1999).
0	5	February 2003	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4, 6-7/6-8 and complex remediation sequence p. 2-15/2-16 (resulting from the addition of Miscellaneous Small Structures Phase II D&D activities and revision of completed D&D activities to date).
0	6	April 2003	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4 and 6-7/6-8 (resulting from the combination of OU4 Phase I and Phase II into one D&D activity and the revised submittal date of May 28, 2004 for the OU4 Implementation Plan).

Activity Description	FY95	FY96	FY97	FY98	FY99	FY00	FY01	FY02	FY03	FY04	FY05	FY06	FY07	FY08	FY09
OU3 COMPLEX D&D BUILDING 4A D&D															
HIGH & LOW NITRATE TANKS															
PLANT 1 COMPLEX - PHASE I D&D															
BOILER & WATER PLANT COMPLEX D&D															
THORIUM/PLANT 9 COMPLEX D&D															
SEWAGE TREATMENT PLANT COMPLEX D&D															
MAINTENANCE/TANK FARM COMPLEX D&D															
PLANT 6 COMPLEX D&D															
GENERAL SUMP COMPLEX D&D															
PLANT 2 COMPLEX D&D															
PLANT 3 COMPLEX D&D															
PLANT 8 COMPLEX D&D															
PILOT PLANT COMPLEX D&D															
LIQUID STORAGE COMPLEX D&D - PH 1															
LABORATORY COMPLEX															
MSS-PHASE II (INCL ELEC COMPLEX) IMP PLAN TO EPA															
MSS-PHASE II (INCL ELECTRICAL STATION) D&D															
ADMINISTRATION COMPLEX D&D															
PLANT 1 COMPLEX - PHASE II D&D															
LIQUID STORAGE COMPLEX D&D - PH 2															
EAST WAREHOUSE COMPLEX D&D															
OTHER STRUCTURE D&D OU4 COMPLEX IMPLEMENTATION PLAN TO EPA															
OU4 COMPLEX D&D															
OU4 COMPLEX IMPLEMENTATION PLAN TO EPA															
OU1 COMPLEX D&D															

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Start Date
Finish Date
Data Date
Run Date

25FEB02
05DEC06
25FEB02
09APR03 11:10

G:\FDR\Schedule1\KQJRA

Sheet 1 of 1

REVISED FIGURE 6-1
BASELINE SCHEDULE (AO 4/03)
FOR OPERABLE UNIT 3 DISMANTLEMENT

Early Bar
Progress Bar
Critical Activity

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TABLE 6-1 OU3 Remedial Design Regulatory Milestones

Complex	Implementation Plan Submittal Dates
Building 4A	19 Sep 94 ^(a)
Plant 1 Complex – Phase I	3 Nov 95 ^(a)
High and Low Nitrate Tanks	20 Feb 96 ^(a)
Boiler Plant/Water Plant Complex	12 Sept 96 ^(a)
Thorium/Plant 9 Complex	2 Jan 97 ^(a)
Tank Farm Complex ^(b)	27 Feb 98 ^(a)
Maintenance Complex ^(b)	27 Feb 98 ^(a)
Sewage Treatment Plant Complex	2 Mar 98 ^(a)
Plant 5 Complex	25 Jan 99 ^(a)
Plant 6 Complex ^(c)	30 Apr 99 ^(a)
East Warehouse Complex ^(c)	30 Apr 99 ^(a)
Pilot Plant Complex	24 May 01 ^(a)
Plant 3 Complex ^(e)	27 June 01 ^(a)
General Sump Complex ^(e)	27 June 01 ^(a)
Plant 2 Complex ^(e)	27 June 01 ^(a)
Plant 8 Complex ^(e)	27 June 01 ^(a)
Liquid Storage Complex ^(e)	27 June 01 ^(a)
Plant 1 Complex – Phase II	19 June 02 ^(a)
Administration Complex	19 Dec 01 ^(a)
Laboratory Complex	18 Apr 02 ^(a)
Electrical Complex ^(f)	5 Mar 03 ^(a)
OU4 Complex	28 May 04
OU1 Complex	3 July 04
<i>Miscellaneous Small Structures</i> ^(d)	30 Apr 98 ^(a)
Miscellaneous Small Structures - Phase II ^(f)	5 Mar 03 ^(a)

- (a) actual submittal date
- (b) Maintenance Complex and Tank Farm Complex Have been combined into one project (i.e., Maintenance/Tank Farm Complex) and a single implementation plan was submitted for this combined complex.
- (c) Plant 6 Complex and East Warehouse Complex have been combined into one project (i.e., Plant 6/East Warehouse Complex) and a single implementation plan was submitted for this combined complex.
- (d) Miscellaneous Small Structures Implementation Plan was developed to efficiently decontaminate and dismantle smaller facilities and structures. Miscellaneous Small Structures has been added to this table in italics to indicate that the Implementation Plan submittal was not tied to an OU3 Remedial Design Regulatory Milestone.
- (e) Plant 3 Complex, General Sump Complex, Plant 2 Complex, Plant 8 Complex and Liquid Storage Complex have been combined into one project (i.e., Multi-Complex) and a single implementation plan was submitted for these five complexes.
- (f) Electrical Complex and Miscellaneous Small Structures - Phase II have been combined into one project (i.e., Miscellaneous Small Structures - Phase II) and a single implementation plan was submitted for this combination of complex and small structures.

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