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State of Ohio Environmental Protection Agency

Southwest District Office

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2003 JUN 25 AM 11:55
Maureen O'Connor, Governor
Christopher Jones, Director

July 23, 2003

FILE: _____

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

LIBRARY: _____

Re: COMMENTS - Silos Dome Penetration and Riser Installation Plan and Video Demonstration

Dear Mr. Reising:

Ohio EPA has reviewed DOE's submittal, "Silos Dome Penetration and Riser Installation Plan" received on July 11, 2003. Ohio EPA also reviewed the video of the demonstration of the cutting of the dome on Silo 4 in June. Attached are our comments on the document and demonstration video.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Michelle Walker
for

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

Ohio EPA Comments on
Silos Dome Penetration and Riser Installation Plan
July 2003

General Comment

- 1. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: na Pg #: na Line #: na Code: C
 Original Comment #:
 Comment: An evaluation should be performed as to the likelihood of the RCS "tripping" during silo penetration. The sudden change in pressure and air flow when the cut-out is removed may cause an upset condition for the RCS.
 Response:
 Action:

Specific Comments

- 2. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.2 Pg #: 2 of 12 Line #: na Code: C
 Original Comment #:
 Comment: What other recommendations were proposed by Mr. Hanskat that may not have been implemented?
 Response:
 Action:

- 3. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: 7 Line #: na Code: C
 Original Comment #:
 Comment: Page 7 of 12 (apparently containing Section 4.1) was missing from all copies of the submittal. Please provide.
 Response:
 Action:

- 4. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.2.3 Pg #: 9 of 12 Line #: na Code: C
 Original Comment #:
 Comment: The third paragraph in this section states that "remaining openings will be sealed....after all the risers on each dome have been installed". Please explain why it is acceptable to leave the openings unsealed on each riser for what could be an undetermined amount of time, versus sealing all openings after each riser is in place.
 Response:
 Action:

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Ohio EPA Comments on
Silos Dome Penetration Demonstration Video
July 2003

Video Comments

- 5. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: na Code: C
 Original Comment #:
 Comment: During the Silo 4 hole cutting video, Ohio EPA observed shims placed in the Silo hole as it was being cut. It is our understanding that these shims are necessary to prevent the plug from settling further into the silo as the hole is cut. However, as the plug was lifted by a crane, most of the shims can be seen falling into the silo. Had this been Silo 1 or 2, DOE would have had to contend with removing this solid debris with the silo contents. DOE needs to formulate a plan to keep the shims and other debris from falling into the silo during plug removal.
 Response:
 Action:

- 6. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: na Code: C
 Original Comment #:
 Comment: Ohio EPA noticed that there was some difficulty aligning the cover plate to the bolts in the silo. While attempting to install the cover plate, the silo hole was totally opened to the atmosphere. It is unsure if the problem is with the accuracy in which the bolts were installed into the silo or properly aligning the plate hole to it's specific corresponding bolt but DOE should formulate a method to hasten the installation of the cover plant over the opened hole of the silo.
 Response:
 Action:

- 7. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: na Code: C
 Original Comment #:
 Comment: Page 10 of the Silo Penetration and Riser Installation Plan states that the Silo 4 demonstration was to have personal in the same level of PPE as would be when working on Silos 1 & 2. When observing the video, it was noted that the worker around the cutting tool on the first opening was in a much higher level of PPE, including a respirator, then workers on the second opening. Please explain.
 Response:
 Action:

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8. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: na Code: C
Original Comment #: One part of the plan which appears to need more practice from the video is the wrapping of the cutout for storage until disposal. The plastic used to wrap the cutouts in the video demonstration was not opened before placing it underneath the cutout, causing the bottom of the cutout (which could contain silo material) to brush across what, when unfolded, became the outside of the wrapper for the cutout. Unless the cutouts were wrapped again off camera, this is not acceptable. Please correct.
Response:
Action: