



Department of Energy
Ohio Field Office
Fernald Environmental Management Project
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



MAY 06 2004

Mr. James A. Saric, Remedial Project Manager
 United States Environmental Protection Agency
 Region V, SR-6J
 77 West Jackson Boulevard
 Chicago, Illinois 60604-3590

DOE-0244-04

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

Dear Mr. Saric and Mr. Schneider:

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

Pursuant to discussions with the United States Environmental Protection Agency (USEPA) and the Ohio Environmental Protection Agency (OEPA), the Department of Energy (DOE) is requesting an amendment to the regulatory milestones contained in the Operable Unit 3 (OU3) Integrated Remedial Design/Remedial Action (RD/RA) Work Plan. The requested amendments are described in the following paragraphs:

Decontamination and Dismantlement (D&D) of Silo 3 (Component 35B) is currently scheduled to begin in October 2004. Additionally, D&D of Silos 1&2 (Component 34B and 34A, respectively) along with the associated treatment buildings and Silo Project infrastructure is currently scheduled to begin in March 2005. Because these components are scheduled for D&D approximately six months apart, DOE is requesting that separate D&D implementation plans be submitted for Silo 3 (including related structures) and Silos 1&2 (including related structures).

The current milestone for the submittal of the OU4 Complex D&D Project Implementation Plan is May 28, 2004 (as identified in Table 6-1 of the OU3 Integrated RD/RA Work Plan). In order to finalize information relating to any OU4 Complex D&D issues and to prepare separate implementation plans for the Silos, the submittal date needs to be moved to a later date. DOE believes that in accordance with the Amended Consent Agreement Section XVIII C.2, "good cause" exists to extend the implementation plan submittal dates regulatory milestone for the OU4 Complex Silo 3 and Silos 1&2 D&D Projects to July 9,

5465 5'69

MAY 20 6 2004

Mr. James A. Saric
Mr. Tom Schneider

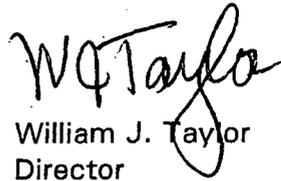
-2-

DOE-0244-04

2004 and December 16, 2004, respectively. These revised submittal dates are based on a three-month timeframe prior to the anticipated start date for D&D. This change is reflected in the revised Tables 2-4 and 6-1 (enclosed).

If you have any questions regarding these proposed changes, please contact Johnny Reising at (513) 648-3139.

Sincerely,


William J. Taylor
Director

FCP:Sattler

Enclosure: As Stated

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

- cc w/o enclosure:
- K. Johnson, OH/FCP
- D. Carr, Fluor Fernald, Inc./MS1
- B. Edmondson, Fluor Fernald, Inc./MS52-0
- D. Edwards, Fluor Fernald, Inc./MS84
- T. Hagen, Fluor Fernald, Inc./MS1
- M. Jewett, Fluor Fernald, Inc./MS52-5
- M. Stevens, Fluor Fernald, Inc./MS87
- ECDC, Fluor Fernald, Inc./MS52-7

OPERABLE UNIT 3

INTEGRATED REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN



SECTIONS 1-7, APPENDICES A through F

APRIL 2004

FERNALD CLOSURE PROJECT
FERNALD, OHIO

U. S. DEPARTMENT OF ENERGY
FERNALD AREA OFFICE

FINAL

Document Control No. 2503-WP-0023 (REV. 0) PCN7

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).
0	7	April 2004	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 2-15/2-16, 6-3/6-4 and 6-7/6-8 (resulting from the creation of separate OU4 D&D Implementation Plans for Silo 3 D&D activity and the Silos 1 & 2 D&D activity. Revised submittal dates of July 9, 2004 and December 16, 2004 for the OU4 Silo 3 and Silos 1 & 2 Implementation Plans respectively).

TABLE 2-4 Complex Remediation Sequence

Remediation Complex*	Components
Building 4A	4A
Plant 1 Complex – Phase I	1A, 30B, 56B, 56C, 66, 67, 72, TS-007
High & Low Nitrate Tanks	18K, 18L
Boiler Plant/Water Plant Complex	10A, 10B, 10C, 10E, 20B, 20C, 24A
Thorium/Plant 9 Complex	9A, 9B, 9C, 9D, 9E, 9F, 32A, 32B, 69, 78, 81
Maintenance/Tank Farm Complex	12A, 12B, 12C, 12D, 19A, 19C, 19D, 19E, 20H, 64, 65
Plant 5 Complex	4B, 5A, 5B, 5C, 5D, 5E, 5G, 55A, 55B
Multi- Complex	2A, 2B, 2C, 2D, 2F, 3A, 3D, 3E, 3H, 3J, 3K, 3L, 8A, 8B, 8C, 8D, 8E, 8G, 8H, 18B, 18D, 18H, 18J, 20E, 20F, 20G, 22B, 22E, 22D, 26A, 26B, 28D, 39A, 45A, 80
Sewage Treatment Plant Complex	25A, 25B, 25E, 28F, 39D
Plant 6/East Warehouse Complex	6A, 6B, 6C, 6D, 6E, 6F, 6G, 20D, 77, 79, 82
Plant 1 Complex – Phase II	1B, 20A, 30A, 56A, 71, TS-004, TS-005, TS-006
Pilot Plant Complex	13A, 13B, 13C, 13D, 37, 54A, 54B, 54C
Administration Complex	11, 14A, 14B, 20K, 53A, 53B, 31A, 46
Laboratory Complex	15A, 15B, 15C, 68
OU1 Complex	18G, 91A, 91B, 91C, 91D, 91E, 91F, 91G, 91H, 91J, 91K
OU4 Complex – Silo 3	35B, 94H, 94M, 94N, 94P, 94Q
OU4 Complex – Silos 1 & 2	34A, 34B, 94A, 94B, 94C, 94D, 94E, 94G, 94J, 94K, 94L, 94R, G-008 Silos 1 & 2 bridge
OU5 Complex	18P, 18Q, 19B, 51, others to be determined
Miscellaneous Small Structures	2E, 2G, 3B, 3C, 3F, 3G, 5F, 8F, 10D, 18M, 22A, 24B, 28A, 28B, 28N, 34C, 38A, 38B, 39B, 39C, 45B, 62, 63
Miscellaneous Small Structures – Phase II	12E, 12F, 12G, 16A, 16B, 16C, 16D, 16E, 16F, 16G, 16H, 16J, 16M, 16N, 16P, 21A, 21C, 22C, 22G, 23A, 24C, 24D, 25C, 25J, 25K, 26C, 28E, 28G, 28H, 28J, 28K, 28L, 28M, 31B, 35A, 50, 52A, 52B, 60, 61, 82B, TS-008, TS-010, TS-011, G-007 Trailers and G-001 Railroad Tracks

*G-coded components such as utility lines, process and non-process trailers and pipe bridges will be dismantled according to availability status or association with the nearest remediation complex.

Gray-shaded components indicate demolition is complete.

A colored illustration of OU3 complexes are shown in Figure 2-2.

In addition to the prioritization and sequencing functions of the PSR, it also served as the mechanism for supplanting the OU3 Facility Utilization Report and for providing the regulatory agencies with any schedule updates. Sections 4.4 and 6 of this work plan incorporate those requirements into the OU3 integrated remedial action.

Since the PSR was updated and submitted to the regulatory agencies in August 1996, the component listing for several complexes have been further revised; however, the overall schedule for completion of OU3 remedial action was not revised. The major revision to the complex listing was the assignment of all components previously defined for the Miscellaneous Complex, except the general components ("G" coded), to appropriate complexes. The general components (e.g., railroad tracks, roads, pipe bridges, non-process trailers), cannot be assigned to individual OU3 complexes as whole entities due to their extensive distribution throughout the FEMP and, as a result, are still discussed as the Miscellaneous Complex. Since the Miscellaneous Complex serves only to reserve the "general" components in somewhat of a queue for future dismantlement, the complex will not be scheduled individually for remediation. The Miscellaneous Complex has therefore been removed from the complex remediation sequence. All components that comprise the Miscellaneous Complex will be remediated under one of the defined complexes. The above-referenced Miscellaneous Complex reassignments include: components 16H, 16J, 23, 25J, 28E, and 28G being placed in the Administration Complex; 18G being placed in the OU1 Complex; and 28D being placed in the Liquid Storage Complex. Other complexes revised include: P-005 (coal pile) will be removed for reuse; and since 28C was previously removed under an independent O&M activity (in 1991), it was deleted from the list.

2.6 Summary of the OU3 Record of Decision for Final Remedial Action

The OU3 Record of Decision for Final Remedial Action identified the selected remedy as the "Selected Material Treatment, On-Property Disposal, and Off-Site Disposition" of material generated by the OU3 interim remedial action and OU3 removal actions. Specifically, the OU3 Final Action ROD states that the OU3 selected remedy consists of the following elements:

- Provides for unrestricted/restricted release of materials, as economically feasible, for recycling, reuse, or disposal;
- Permits treatment of materials to meet the on-site disposal facility and/or off-site disposal facility waste acceptance criteria;
- Requires off-site disposal of process residues, waste product materials, and process-related metals;
- Requires off-site disposition of acid brick and concrete from specific locations and any other materials exceeding the OSDF WAC;
- Permits disposal of remaining OU3 wastes in the OSDF;

Activity Description	Fiscal Year											
	FY95	FY96	FY97	FY98	FY99	FY00	FY01	FY02	FY03	FY04	FY05	FY06
OU3 COMPLEX D&D	[Gantt bars for FY95-FY07]											
BUILDING 4A D&D	[Gantt bar]											
HIGH & LOW NITRATE TANKS	[Gantt bar]											
PLANT 1 COMPLEX - PHASE I D&D	[Gantt bar]											
BOILER & WATER PLANT COMPLEX D&D	[Gantt bar]											
THORIUM/PLANT 9 COMPLEX D&D	[Gantt bar]											
SEWAGE TREATMENT PLANT COMPLEX D&D	[Gantt bar]											
MAINTENANCE/TANK FARM COMPLEX D&D	[Gantt bar]											
PLANT 5 COMPLEX D&D	[Gantt bar]											
PLANT 6 COMPLEX D&D	[Gantt bar]											
GENERAL SUMP COMPLEX D&D	[Gantt bar]											
PLANT 2 COMPLEX D&D	[Gantt bar]											
PLANT 3 COMPLEX D&D	[Gantt bar]											
PLANT 8 COMPLEX D&D	[Gantt bar]											
PILOT PLANT COMPLEX D&D	[Gantt bar]											
LIQUID STORAGE COMPLEX D&D - PH 1	[Gantt bar]											
LABORATORY COMPLEX	[Gantt bar]											
MSS-PHASE II (INCL ELEC COMPLEX) IMP PLN	[Gantt bar]											
MSS-PHASE II (INCL ELECTRICAL STATION) D&D	[Gantt bar]											
ADMINISTRATION COMPLEX D&D	[Gantt bar]											
PLANT 1 COMPLEX - PHSE II D&D	[Gantt bar]											
LIQUID STORAGE COMPLEX D&D - PH 2	[Gantt bar]											
EAST WAREHOUSE COMPLEX D&D	[Gantt bar]											
OTHER STRICTURAL D&D	[Gantt bar]											
OU1 COMPLEX IMPLEMENTATION PLAN TO EPA	[Gantt bar]											
SILO 3 IMPLEMENTATION PLAN TO EPA	[Gantt bar]											
OU1 COMPLEX D&D	[Gantt bar]											
SILO 3 D&D	[Gantt bar]											
SILO 1&2 IMPLEMENTATION PLAN TO EPA	[Gantt bar]											
SILO 1&2 D&D	[Gantt bar]											

© Primavera Systems, Inc.

Start Date
Finish Date
Data Date
Run Date

25FEB02
05DEC06
25FEB02
19APR04 10:47

RDR4

REVISED FIGURE 6-1
BASELINE SCHEDULE (A/O 4/03)
FOR OPERABLE UNIT 3 DISMANTLEMENT
PCN 7

Sheet 1 of 1

Early Bar
Progress Bar





This page left intentionally blank.

5465

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 – Silo 3	9 July 04
OU4 Complex – Silos 1 & 2	16 Dec 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.

This page left intentionally blank.