

Critical Analysis Team Memo

**To: Fernald Citizens Advisory Board
John Sattler
Steve Beckman**

From: Critical Analysis Team

Date: 2 July 2004

Re: Potential impacts of a significant delay in startup and operations of silos facilities.

At the FCAB's request, the CAT has further discussed the possibility of an extended delay in the startup and operation of Silos facilities as a result of the Nevada disposal issue. The CAT's fundamental concern is: *A delay of three to five months in startup and operation could place the project at risk of the silos material remaining in the silos for years.*

The threat to the project would be a result of several important factors, including:

- The loss of key project personnel, trained staff, project documentation and 'tribal knowledge'. In a matter of months, the team that has been assembled to operate the silos facilities would be dispersed in other areas of the site or found other employment. Reconstituting and training a staff to startup and operate these facilities would be expensive and time consuming.
- New staff (and possibly a new contractor) would not be invested in the existing facility design. As a result, new personnel may choose to redesign, modify or replace the existing facilities prior to retrieval of waste from the silos.
- New leadership on the national stage (regardless of the outcome of the presidential election) may lead to questioning the wisdom of the silos project. In this case, significant time could be spent re-examining alternatives.
- New regulatory documentation (ROD Amendment or new ROD) could be required.
- New budget, shipping, planning and contracts would be necessary.
- The staffing, training, testing, retrieval, processing, packaging, and transportation plans must be developed and supported through the lengthy budget process for restart of the silos project. Many of these activities will involve the approval of external entities such as Congress.
- Placing a facility in standby would require the preparation and implementation of plans for line cleanout and instrument line purging, line flushing and drying, preparation of equipment based on vendor recommendations, lockout and tagging of valves, fans, motors, electrical circuits, control circuits, etc. In addition, all project drawings, specifications, manuals, design change notices, test procedures and results, and contracts will have to be identified, located and stored in a retrievable form.

- Restart of a facility would require walkdowns to verify operability. In addition, testing and system readiness reviews will need to be conducted.
- The 'balanced approach' cleanup agreement with Fernald's stakeholders allowed the disposal of significant quantities of waste on-site. A significant silos delay could lead to the opinion that DOE has not met its agreement. This could lead to challenges to the entire Fernald cleanup approach, resulting in delays.

As a result of the above, the CAT urges DOE and Fluor Fernald to begin operations of the facility as soon as possible.