UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD
OG F-00571

05 APR 14 A 8:42

ILE: 5488.6

REPLY TO THE ATTENTION OF:

April 13, 2005

Mr. Johnny W. Reising
United States Department of Energy
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246

SR-6J

RE: Uranium Assay Adjustment Workplan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) March 24, 2005, revised workplan for the uranium adjustment project. The plan has been revised to address comments presented by the Ohio Environmental Protection Agency. Although the document appears acceptable, U.S. EPA noted inconsistencies in the quantitative aspects of the data as presented. A comment is enclosed addressing those inconsistencies. U.S. DOE should make the necessary changes to the tables to address any discrepancies.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jamie Jameson, Fluor Fernald
Frank Johnston, Fluor Fernald

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 50% Recycled Paper (20% Postconsumer)

bcc w/enclosure:
Michelle Cullerton, Tetra Tech
Gene Jablonowski, SR-6J

bcc w/o enclosure:
Brian Barwick, ORC

TECHNICAL REVIEW COMMENT ON
"URANIUM ASSAY ADJUSTMENT PROJECT WORK PLAN"

FERNALD CLOSURE PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric
Section #:Not applicable (NA) Page #: NA Line #: NA
Original General Comment #:1
Comment: The concept and qualitative procedures presented in the work plan are fully acceptable. However, there are numerous inconsistencies in the quantitative aspects, especially in the data on the masses of the wastes to be treated and the uranium concentrations in those wastes. For example, none of the entries in the "percent uranium-235" and "percent uranium" columns of Table 2.1 on page 16 agree with the data in the text on the preceding pages of Section 2.0. Also, the calculated uranium mass in the last line of the table (for container W514065) is inconsistent with the data in both the table and the text. In addition, discrepancies exist between several of the "net weight" entries in Table 2.1 and the corresponding data in Attachment 2, "Project Waste Identification and Disposal Report 648." Finally, the input numbers in Table 5.1 are similar but not identical to those presented in the text of Section 2.0.

As discussed in Sections 5.1.2 and 6.1 of the work plan, the treated waste is to be disposed of at Envirocare of Utah. Therefore, it is essential that each sample meets the disposal facility's permit limit of 1,900 picocuries per gram of uranium-235. All numbers related to concentrations, especially uranium-235 concentrations, should be verified in order to ensure that accurate values are used to calculate the necessary sample dilutions.