



Department of Energy
Ohio Field Office
Fernald Environmental Management Project
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Mr. Gene Jablonowski, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0037-04

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

Dear Mr. Jablonowski and Mr. Schneider:

**STATUS OF TRANSITIONING DECONTAMINATION AND DEMOLITION WORK SCOPE
ACTIVITIES TO SELF-PERFORMANCE**

This letter is provided for informational purposes and conveys the status of activities associated with the transition of the facility Decontamination and Demolition (D&D) work scope from the remediation subcontractor (MACTEC) to self-performance by Fluor Fernald. As discussed with the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) over the past few weeks, Fluor Fernald has de-scoped all remaining D&D tasks from MACTEC and intends to self-perform much if not all of the remaining D&D work scope at the Fernald Closure Project. This decision will permit Fluor Fernald to maintain tighter control over the safety, quality, regulatory compliance, cost, and schedule aspects of the remaining D&D activities. While this transition represents a change in the organizational approach to performing D&D work activities, DOE recognizes that it does not alter any of the regulatory requirements or agreements set forth through the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. This includes, but is not limited to the Record of Decision for Operable Unit 3, the Operable Unit 3 Integrated Remedial Design/Remedial Action Work Plan, the complex-specific implementation plans approved by the agencies, the Waste Acceptance Criteria Attainment Plan for the On-Site Disposal Facility and all associated Operable Unit 3 applicable or relevant and appropriate requirements. Many of these documents refer to D&D activities being performed by a remediation subcontractor, however, as the project moves forward under a Fluor Fernald self-perform organization, these activities will be performed by direct hire Fluor Fernald employees. All methods and manner of work execution under the Fluor Fernald self-perform organization including the

Mr. Gene Jablonowski
Mr. Tom Schneider

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responsibilities of the Waste Acceptance Organization will remain compliant with the regulatory framework established for the Operable Unit 3. While Fluor Fernald plans to self-perform a substantial portion of the remaining D&D work, selective subcontracting will be evaluated as new D&D tasks are planned and may be used in support of the self-perform approach as appropriate.

Because of the close link between the Soil and Disposal Facility Project (SDFP) and the D&D project, the two projects will be combined to form the Demolition, Soils and Disposal Project (DS&DP). This merger will directly benefit overall project execution by taking the lessons learned from building a successful self-perform organization within the SDFP and applying them to the D&D organization. Based on the demonstrated success of Fluor Fernald's self-perform activities in the SDFP, DOE supports this transition in the work execution approach.

The resumption of D&D activities under a Fluor Fernald self-perform organization will proceed in a sequential fashion over the next few weeks as the administrative infrastructure (i.e., training and qualification plans, work authorization/control documents, and health and safety documentation) is established. Prior to activities resuming, an independent Fluor Fernald management assessment with DOE oversight will be conducted to ensure the project is ready to initiate D&D tasks in a safe and controlled fashion.

If you have any questions or need further information, please contact Johnny Reising at (513) 648-3139.

Sincerely,



for William J. Taylor
Director

FCP:Reising

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Mr. Gene Jablonowski
Mr. Tom Schneider

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cc:

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