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June 15 1992

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Terry A Vaeth
Manager
DOE RFO

JUN 15 1992

Attn P M Powell

INTERAGENCY AGREEMENT SCHEDULES AND NEPA INTEGRATION JEE 0390 92

In comparing the existing IAG schedules with the adjusted schedule for preparation of the Sitewide Environmental Impact Statement (SWEIS) it has become apparent that it may be necessary to separate the NEPA documentation for Operable Unit (OU) No 1 from the SWEIS with regards to final actions. Present IAG schedules require the completion of the Feasibility Study/Corrective Measures Study (FS/CMS) for OU No 1 by March 1993 and a Record of Decision (ROD) by December 1994. Adjusted schedules of the SWEIS now have the SWEIS ROD tentatively set for the first quarter of 1995 approximately a 15 month delay in schedule from the original SWEIS completion date of December 1993.

To meet both the requirements of the IAG and the SWEIS the following actions are recommended

Separation of OU No 1 activities from the SWEIS by initiation of an Environmental Assessment (EA) if required by August 1 1992. Dependent upon the proposed action associated with the FS/CMS for OU No 1 activities may qualify for Categorical Exclusions (CX) presented in 10 CFR 1021 National Environmental Policy Act Implementing Procedures Appendix B to Subpart D CERCLA Removals. OU No 1 can be considered an interim action per guidance given in 40 CFR 1506.1 and reiterated in 10 CFR 1021.211. Thus NEPA/CERCLA integration would be achieved during the FS/CMS by completion of a FS/CMS/EA or CX. Detailed evaluation and analysis of alternatives during the FS/CMS per 40 CFR 300.430(e)(9) will provide sufficient analysis to rigorously explore and objectively evaluate all reasonable alternatives as required by 40 CFR 1502.14(a). This approach is consistent with the DOE RFO recommendation ERD BKT 1983 addressing preparation of NEPA documentation as part of the analysis of alternatives.

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By *B M Hoffman*

Date 8 25 92

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If the NEPA process for OU No 1 would not result in a Categorical Exclusion or Finding of No Significant Impact (FONSI) then activities proposed would be combined with proposals in the SWEIS

The SWEIS will retain its programmatic role as defined within 10 CFR 1021.330 by assessing cumulative impacts associated with restoration activities at RFP. This will facilitate the plant goals to achieve NEPA/CERCLA integration while maintaining commitments to agency schedules.

If you require any additional information please contact Steve Nesta Ecology and NEPA Division on X8605



J. E. Evered, Director
Environmental Management
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cc

R J Schassburger DOE RFO