

Comprehensive Legacy Management and Institutional Controls Plan, Revision 8, Draft
Significant Changes Summary

Section	Description of Modification	Driver/Technical Information
Volume I, Legacy Management Plan		
Section 1	Replaced DOE Order 5400.5 with DOE Order 458.1 in Section 1.2.	Updated DOE Order.
	Updated documents that address legacy management issues across the DOE complex in Section 1.2	
Section 2	Added a sentence clarifying that Silo 4 was empty in Section 2.3.	
	Updated current flyover pictures and increased the acreage designated as "Prairie and Grassland" in Figure 2, "Fernald Land Use." This change is not marked with redline strikeout.	Portions of pasture areas that were not previously included in the "grassland" acreage were added. This addition more accurately reflects total site land use.
Section 3	No significant changes.	
Section 4	No significant changes.	
Section 5	Updated the site contractor records management staff phone number in Section 5.4.	
Section 6	No significant changes.	
Section 7	Updated references.	

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Section	Description of Modification	Driver/Technical Information
Volume II, Institutional Controls Plan		
Section 1	Updated the project date of completion of the pump and treat portion of the groundwater remedy from 2026 to 2035 in Section 1.0.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
Section 2	Updated current flyover pictures and increased the acreage designated as "Prairie and Grassland" in Figure 1, Fernald Land Use. This change is not marked redline strikeout.	Portions of pasture areas that were not previously included in the "grassland" acreage were added. This addition more accurately reflects total site land use.
	Included information pertaining to the OU3 ROD fact sheet concerning reuse of buildings for long-term use in Section 2.1.3.1.	
	Added the Sycamore Trail boardwalk to Figure 2. This change is not marked redline strikeout.	Construction of the boardwalk was completed in 2014.
	Added Figure 3 and revised the description of the site inspection process. Figure 3 identifies site inspection quadrants. The revised process for site walkdowns involves concentrating walkdowns in the winter months, when visibility and access are better.	Response to Ohio EPA comment during fall 2014 inspection.
	Revised Section 2.1.3.3 to address Ohio EPA comment dealing with findings reported in the Site Environmental Report.	Response to Ohio EPA 2013 SER, Comment Number 1.
	Modified wording in Section 2.1.3.3 associated with moving to an electronic database for the inspection findings.	

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Section	Description of Modification	Driver/Technical Information
Volume II, Institutional Controls Plan, Continued		
Section 3	Updated Section 3.1 with information from the Third Five-Year Review Report for the Fernald Preserve with respect to human-health risk.	
	Updated Section 3.1.1 to address the revised site inspection process described in Section 2.1.3.3 and summarized above.	Response to Ohio EPA comment during fall 2014 inspection.
	Added criteria for outfall line inspection to Section 3.1.1.	Change required due to gravel mining operations in the outfall line area.
	Updating groundwater operational information based on the operational changes in Section 3.1.3.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i>
	Updated Table 3 to reflect the changes in inspections and NPDES permit requirements.	
	Clarified unscheduled inspections in Table 4 to ensure consistency with PCCIP.	
Section 4	Updated Section 4.1 to ensure consistency with the PCCIP.	
	Updated the contact information for the contractor site manager in Section 4.2.	

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Section	Description of Modification	Driver/Technical Information
Volume II, Institutional Controls Plan, Continued		
Section 5	Updated Section 5.1 with contact information to request environmental dosimeter, leachate collection system and leak detection system, and groundwater operational data.	
	Updated Section 5.1.1 and 5.1.2 with updated information concerning inspection forms and the electronic database being used.	Data is longer available on the webpage, in accordance with an agreement with the Ohio EPA.
	Updated site contractor records management personnel contact information in Section 5.2.3.	
Section 6	Updated References.	
Appendix A	No changes.	
Appendix B	No changes.	
Appendix C	Updated Contact Information in Appendix C including the EPA Remedial Project Manager and the contractor Community Relations Specialist.	
Appendix D	Updated Inspection Forms in Appendix D. This change is not marked in redline strikeout.	

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Section	Description of Modification	Driver/Technical Information
Volume II, Attachment A - Operations and Maintenance Master Plan		
Section 1	No significant changes.	
Section 2	Updated Section 2.1 with information concerning the site operating under an expired NPDES permit until the new permit can be approved.	Current NPDES permit expired March 31, 2014, and a new permit is expected in late 2014 or early 2015.
	Revised Section 2.2.1 with changes resulting from the groundwater remedy operational adjustments implemented in 2014.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
	Updated Figure 2 to reflect new predicted completion dates based on operational adjustments made in 2014.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
Section 3	Revised Section 3.1.1.2, 3.1.1.3, and 3.3.1 with changes resulting from groundwater remedy operational adjustments.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
	Revised Section 3.1.1.1 to provide additional information on well RW-5, which was turned off in 1993.	
	Updated Section 3.6.1 with information concerning the site operating under an expired NPDES permit until the new permit can be approved.	Current NPDES permit expired March 31, 2014 and a new permit is expected later in 2014 or early 2015.
	Updated Table 1 to reflect wells turned off as a result of groundwater remedy operational adjustments.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
	Updated Figure 4 with changes based on operational adjustments. The revised figure is inserted without the changes marked.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)

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Section	Description of Modification	Driver/Technical Information
Volume II, Attachment A - Operations and Maintenance Master Plan, Continued		
Section 4	Updated Section 4.1 and Table 2 to reflect groundwater remedy operational adjustments.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
Section 5	No significant changes.	
Section 6	Updated Section 6.2.1.1, 6.2.1.2, and 6.2.3 with current operational information.	
	Deleted a sentence regarding CAWWT operation in Section 6.3.2, as it is discussed in Section 2.2.1.	
Section 7	Updated to reflect the site's current organizational responsibilities.	
Section 8	Updated references.	
Volume II, Attachment B - Post-Closure Care and Inspection Plan		
Section 1	No significant changes.	
Section 2	Replaced DOE Order 5400.5 with DOE Order 458.1.	Updated DOE Order.
Section 3	Provided additional text in Section 3.4 with respect to changes in photographic technology improvements.	
Section 4	No significant changes.	
Section 5	No significant changes.	
Section 6	No significant changes.	
Section 7	No significant changes.	
Section 8	Revised Section 8.1 to clarify that follow-up and contingency inspections in the PCCIP are specific to the OSDF.	
Section 9	No significant changes.	
Section 10	Combined the content of the former Section 10.3, "Unusual Occurrences and Earthquakes," and the former Section 10.4, "Meteorological Events," into a new Section 10.3.	
Section 11	No significant changes.	
Section 12	Updated references.	

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Volume II, Attachment C - Groundwater/Leachate Management Plan		
Section 1	Updated the flow volume monitoring frequency from weekly to monthly for containment piping and leachate transmission system piping in Table 1.	Changed text to be consistent with approved language in the "EPLTS gravity line" item in Table 1 in Appendix D to this attachment.
Section 2	Updated the early estimate for completion of the pump and treat portion of the groundwater remedy to 2035 in Section 2.3.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
Section 3	Corrected the OSDF acreage.	
Section 4	No significant changes.	
Section 5	Updated Section 5.0 with aquifer restoration operational adjustments.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
Section 6	Updated Section 6.0 with contact information to request leachate collection system and leak detection system data.	Data is longer available on the webpage, in accordance with an agreement with the Ohio EPA.
Appendix A	No significant changes.	
Appendix B	No significant changes.	
Appendix C	No significant changes.	
Appendix D	Updated OSDF valve house alarm transmittal and response information.	Alarm notification at CAWWT no longer needed due to decreasing leachate flow and daily inspection of the valve houses.
	Updated OSDF inspection criteria with current criteria.	
Appendix E	No significant changes.	

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Volume II, Attachment D - Integrated Environmental Monitoring Plan		
Section 1	Replaced DOE Order 5400.5 with DOE Order 458.1.	Updated DOE Order.
	Added Appendix B, "Sloan's Crayfish Management Plan."	Sloan's Crayfish relocation was necessary in 2014 due to the Paddys Run Streambank Stabilization Project.
Section 2	No significant changes.	
Section 3	Revised elements throughout the section to reflect the aquifer restoration Operational Design Adjustments made in 2014.	EPA and Ohio EPA approval and implementation of <i>Operational Design Adjustments-1, WSA Phase-II Groundwater Remediation Design Fernald Preserve</i> (DOE 2014)
	Added a paragraph summarizing the access issues associated with the Paddys Run Road Site wells to Section 3.6.1.4.	Current property owners will not allow access to several wells.
	Updated the content of Table 3 with 2013 analytical data. These changes, due to the number of changes and difficulty with presenting the data, are not noted with redline strikeout or blue font.	
Section 4	Added a bullet concerning temporary sedimentation controls to Section 4.3.2.4	
	Updated information concerning NPDES permit, which expired March 31, 2014, to Section 4.3.2.6.	
Section 5	Provided additional clarification concerning the reduction of radon-222 in 2008 and the use of updated DOE standards for calculating dose for the surface water pathway in Section 5.0.	DOE has finalized a new Derived Concentration Technical Standard, DOE-STD-1196-2011, which was incorporated into the site's dose calculations.
Section 6	Corrected the number of dosimeters in the dose assessment program in Section 6.0	
	Updated Section 6.0 with contact information to request environmental dosimeter, leachate collection system and leak detection system, and groundwater operational data.	Data is longer available on the webpage, in accordance with an agreement with the Ohio EPA.
Section 7	Updated references.	

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Volume II, Attachment D - Integrated Environmental Monitoring Plan, Continued		
Appendix A	Updated Section 4.1.1 to address Sloan's Crayfish relocation.	Sloan's Crayfish relocation was necessary in 2014 due to the Paddys Run Streambank Stabilization Project.
	Updated Section 4.1.2 with Indiana Bat habitat survey with respect to Paddys Run Streambank Stabilization Project.	
Appendix B	Updated and incorporated the Sloan's Crayfish Management Plan, which has not been in the LMICP since 2007.	Sloan's Crayfish relocation was necessary in 2014 due to the Paddys Run Streambank Stabilization Project.
Volume II, Attachment E - Community Involvement Plan		
Section 1.0	No significant changes.	
Section 2.0	Added summary level information to Section 2.0 about site remediation activities that occurred between 1996 and 2006, the transfer of the site to LM, and the opening of the site to the public in 2008.	
Section 3.0	Added summary paragraph on the November 2008 Consent Decree for the natural resources damage claim.	
Section 4.0	Updated Section 4.0 with current population information for the surrounding area.	
Section 5.0	Updated Section 5.0 with site manager's phone number and the updated policy for the Program Shelter.	Incorporation of the Program Shelter, which was constructed in 2014.
Appendix A	Updated Contact List.	