



Department of Energy

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NOV 16 2001

Mr. Gene Jablonowski, Remedial Project Manager
United States Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0127-02

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

Dear Mr. Jablonowski and Mr. Schneider:

SCHEDULE EXTENSION REQUEST FOR ABOVE GRADE DECONTAMINATION AND DISMANTLEMENT OF COMPONENT 5F, PLANT 5 PIPE BRIDGE, EAST WAREHOUSE COMPLEX, AND PLANT 3 PIPE BRIDGE

The purpose of this letter is to request an extension to the completion date schedules for Component 5F, Plant 5 Pipe Bridge, East Warehouse Complex, and Plant 3 Pipe Bridge. Enclosed is the basis of the request for each of the completion dates. This request is based on the overall evaluation of the remaining Decontamination and Dismantlement (D&D) activities, ongoing waste management activities, and soil excavation activities as discussed with you on October 22, 2001. The evaluation has indicated that the schedule of some remaining buildings and components would best support the overall D&D Program as well as the overall site mission if the D&D schedules are adjusted, as identified in this request. As discussed on October 22, 2001, additional to the schedule extension request and as part of the evaluation of the D&D program, acceleration of D&D activities is planned for the Health and Safety Building (53A) as part of the Administration Complex and accelerated D&D of the Old Radon Treatment Building (34C).

Therefore, the Department of Energy, Fernald Environmental Management Project (DOE-FEMP), believes that, in accordance with the Amended Consent Agreement, Section XVII C. 2, "good cause" exists to extend the completion date milestones of Component 5F, Plant 5 Pipe Bridge, East Warehouse Complex, and Plant 3 Pipe Bridge to the dates indicated on the enclosed evaluation.

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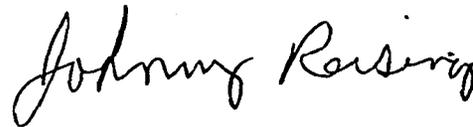
Mr. Gene Jablonowski
Mr. Tom Schneider

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If you have any questions, please contact John Trygier at (513) 648-3154.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Trygier

Enclosure: As Stated

cc w/enclosure:

R. Greenberg, EM-31/CLOV
J. McCloskey, EM-31/CLOV
J. Trygier, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosures)
J. Saric, USEPA-V, SRF-5J
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Hodge, Tetra Tech
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

L. Parsons, OH/FEMP
A. Tanner, OH/FEMP
D. Carr, Fluor Fernald, Inc./MS2
J. R. Fry, Fluor Fernald, Inc./MS44-0
T. Hagen, Fluor Fernald, Inc./MS65-2
S. K. Hinnefeld, Fluor Fernald, Inc./MS44-0
L. K. Howard, Fluor Fernald, Inc./MS44-0
T. A. Proff, Fluor Fernald, Inc./MS65-2
M. Stevens, Fluor Fernald, Inc./MS44-0
ECDC, Fluor Fernald, Inc./MS52-7

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**Completion Date Schedule and Description of Work/Summary of Strategy for Above-Grade
D&D of Component 5F, the Plant 5 Pipe Bridge, the East Warehouse Complex, and the
Plant 3 Pipe Bridge**

Schedule	Current Completion Date	Revised Completion Date
Component 5F and Plant 5 Pipe Bridge	January 28, 2002	December 31, 2002
East Warehouse Complex	November 19, 2002	September 30, 2007
Plant 3 Pipe Bridge	November 28, 2001	December 30, 2002

The purpose of this document is to provide a description of work and summary of strategy for D&D Projects as a result of the Fluor Fernald Closure Plan, the new Closure Contract, Soil Excavation activities, Waste Generator Services activities, and Fiscal Year 2001 supplemental funding.

The D&D Projects mission is to D&D all structures in the Fluor Fernald Closure Plan in a safe, cost efficient, and timely manner to allow at- and below-grade soil excavation activities to proceed on or ahead of schedule. In order to achieve this mission, the D&D schedule of all the structures identified in the Fluor Fernald Closure Plan were reviewed to determine the most efficient D&D strategy. The strategy encompasses the existing components as identified in previously submitted Implementation Plans and letters as well as the remaining complexes and miscellaneous structures. The following tables identify those Implementation Plans that have been previously submitted and those that will be submitted in the future:

Implementation Plans Previously Submitted with Remaining Components

Implementation Plan	Remaining Components as of 10/1/01
Miscellaneous Small Structures	Plant 3 Pipe Bridge
Maintenance/Tank Farm Complex	Buildings 64 and 65
Plant 5 Complex	Building 5F and the Plant 5 Pipe Bridge
Plant 6/East Warehouse Complex	The East Warehouse Complex (Buildings 77, 79, 82A, and Component 20D) and the Plant 6 Pipe Bridge
Multi-Complex (Plant 2, Plant 3, Plant 8, General Sump, and Liquid Storage Complexes)	Buildings 2A, 2B, 2C, 2D, 2F, 2H, 3A, 3D, 3E, 3H, 3J, 3K, 3L, 8A, 8B, 8C, 8D, 8E, 8G, 8H, 18B, 18D, 18H, 18J, 20E, 20F, 20G, 22B, 22D, 22E, 26A, 26B, 28D, 39A, 45A, 80, and G-008
Pilot Plant Complex	Buildings 13A, 13B, 13C, 13D, 37, 54A, 54B, 54C, and 74U

Implementation Plans To Be Submitted

Implementation Plan	Components
Administration Complex	11, 14A, 14B, 16H, 16J, 23, 25J, 28E, 28G, 53A, and 53B
Laboratory Complex	15A, 15B, and 15C
Plant 1, Phase II Complex	1B, 30A, 56A; 60, 61, 71, TS-004, TS-005, and TS-006
Electrical Substation Complex	16A, 16B, 16C, 16D, 16E, 16F, 16G, 26C, 31A, and 46
OU1 Complex	18G and others to be determined
OU4 Complex	34A, 34B, 34C, 35A, 35B, 94A and others to be determined

As a result of this review, the schedules of some remaining buildings or components must be adjusted in order to best achieve the D&D mission as well as the overall site mission. It was determined that the D&D of some structures would be accelerated while the D&D of others will require a schedule extension. The structures that will be accelerated include the Health and Safety Building (53A) and the Radon Treatment System Building (34C). The structures that require a schedule extension include the Plant 5 Covered Storage Pad (5F) and associated Plant 5 Pipe Bridge, the East Warehouse Complex, and the Plant 3 Pipe Bridge. The accelerated schedule for the Health and Safety Building will be submitted as part of the Administration Complex Implementation Plan. The Administration Complex Implementation Plan is scheduled to be submitted in December 2001. The notification to D&D Building 34C was submitted under the Miscellaneous Small Structures Implementation Plan in early November 2001. A description and explanation of the buildings and components that require a revision to the completion milestone dates are presented below:

Component 5F and the Plant 5 Pipe Bridge: Building 5F and the Plant 5 Pipe Bridge (the pipe bridge section that parallels Second Street between "B" Street and "D" Street) were initially submitted as part of the Plant 5 Complex Implementation Plan with a completion date of January 28, 2002. Because Building 5F and the Plant 5 Pipe Bridge support utility services such as electric and telecommunications that feed occupied structures, Fluor Fernald and DOE have determined that it is more cost effective to extend the D&D of these structures than to redistribute the associated utilities. Therefore, these components were not demolished with the remainder of the Plant 5 Complex, but are being planned for D&D completion by December 30, 2002. This revised completion date will not impact subsequent Area 4A soil excavation activities.

East Warehouse Complex: The East Warehouse Complex (Building 77, Building 79, Building 82A, and Component 20D) was initially submitted with the Plant 6/East Warehouse Complex Implementation Plan with a completion date of November 19, 2002. Based on waste management scope and schedules (which are detailed in the Fluor Fernald Closure Plan) coupled with the ongoing D&D of site structures, it is evident that warehouses suitable for nuclear materials packaging and mixed waste handling and storage are at a premium. Buildings 77 and 79 are both comparatively new warehouses and remain in good condition. Another benefit of Building 77, which is used as the hub of nuclear material packaging and shipment (by truck), is that it is one of the few facilities at Fernald that has a truck dock. Building 79 is an approved RCRA storage facility and is the site warehouse best suited for handling mixed waste liquids and includes the operation of the TSCA bulk liquid tanks and the separation of oils from drummed liquids. Finally, Building 82A can be readily utilized as a radiological control point, change facilities, and/or project offices to support soil excavation activities within the former Production Area. Therefore, because of ongoing waste management and nuclear materials packaging needs and the obvious benefits to retaining the structures, it is requested that the completion date for the removal of the East Warehouse Complex be extended to September 30, 2007. As an added note, the completion date for the Plant 6 Pipe Bridge does not need to be extended and will be completed by November 19, 2002. The D&D of the Plant 6 Pipe Bridge is being completed in 2002 in order to support Area 4A soil excavation activities.

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Plant 3 Pipe Bridge: The D&D of the Plant 3 Pipe Bridge was originally part of the Plant 3 Complex, but is also covered within the scope of the Miscellaneous Small Structures Implementation Plan (MSSIP). However, as part of an intermediate step to accelerate work in the Plant 3 area, the Plant 3 Pipe Bridge was identified for early D&D and a milestone established for November 28, 2001.

As a result of several factors (including the extent of associated hazards), it has been determined that it would be safer and more efficient to D&D this pipe bridge in parallel with the Plant 3 Complex, utilizing an alternate approach to pipe disposition. This alternate approach includes the flushing and inspection of process piping systems in an attempt to minimize the piping debris that must be dispositioned off site. If the inspection reveals that the piping meets the Waste Acceptance Criteria, the material will be dispositioned in the On-Site Disposal Facility. This approach differs from the previous practice of sending all process piping off site. A plan is being prepared to monitor and qualify this alternate method to determine if this approach is efficient. The plan will address and evaluate all aspects of this approach from initial removal through disposal. The information gathered from this alternate approach will be used to help determine if this approach would be useful on future process piping removal activities. Therefore, in order to conduct and evaluate this alternate approach, it is requested that the completion date for this component be extended from November 28, 2001 to December 30, 2002.