



Department of Energy
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JUL 28 2003

Mr. Gene Jablonowski, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0460-03

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

Dear Mr. Jablonowski and Mr. Schneider:

**RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON
THE REVISED APPROACH TO DECONTAMINATION AND DISMANTLEMENT SEQUENCE
FOR THE MULTI-COMPLEX DECONTAMINATION AND DISMANTLEMENT PROJECT**

Enclosed are comment responses to the five comments provided on July 17, 2003 by the Ohio Environmental Protection Agency (OEPA) concerning the revised approach to the Decontamination and Dismantlement (D&D) sequence for the Multi-Complex D&D project. These comments were issued by email in a follow-up to our teleconference on Tuesday, July 15, 2003. As discussed during the teleconference, DOE and Fluor Fernald are proceeding with the implementation of the revised approach, following the guidelines and methods summarized in our July 11, 2003 letter, and as further elaborated in the enclosed comment responses.

Again we welcome any visits by you or your staff members to observe that the steps outlined in our earlier letter and in the enclosed responses are being adequately implemented in the field. Both DOE and Fluor Fernald maintain our commitments to the Waste Acceptance Operations (WAO) oversight process and will continue to ensure that adequate resources are utilized in the field.

JUL 28 2003

DOE-0460-03

Mr. Gene Jablonowski
Mr. Tom Schneider

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

Sincerely,



Glenn Griffiths
Acting Director

FCP:Trygier

Enclosure: As Stated

cc w/enclosure:

J. McCloskey, EM-31/CLOV
M. Boyd, OH/FCP
J. Trygier, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
J. Saric, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
B. Edmondson, Fluor Fernald, Inc./MS52-0
M. Jewett, Fluor Fernald, Inc./MS52-5
R. Nichols, Fluor Fernald, Inc./MS7
M. Stevens, Fluor Fernald, Inc./MS87
ECDC, Fluor Fernald, Inc./MS52-7

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**RESPONSES TO OHIO EPA COMMENTS ON
THE REVISED APPROACH TO
DECONTAMINATION AND DISMANTLEMENT SEQUENCE FOR
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**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

JULY 2003

U.S. DEPARTMENT OF ENERGY

monitoring), Fluor Fernald will be instituting the use of respiratory protection for workers and inspection personnel involved with the felling and size reduction of those portions of structures that have an increased potential of containing (and therefore releasing) radiological material. The monitoring intensity, frequency, and parameters for both the breathing zone and project boundary monitoring will follow the historically conservative approaches executed to date, following the Project Specific Air Sampling Plan SD-1064.

Commenting Organization: OEPA Commentor: Schneider
Section#: NA Pg.#: NA Line#: NA

Original Specific Comment #3

Comment: The plan and telephone conference suggest a range of 3% to 25% of process related equipment remaining in a given structure. This is a very wide range. In order to better understand the potential for environmental release and AWAC detection problems at a given facility more detail is needed. The proposal should include a listing of facilities and estimated quantities and types of process related equipment being left in place for removal under the proposed method.

Response: We wish to clarify that the estimated percentage of process related equipment and piping expected to be in place at the time the transite siding is removed (20 percent that was stated in the letter) is a collective total across Plant 2, Plant 8, and the Hot Raffinate Building. As requested, the list of items are as follows: for Plant 2A (Ore Refinery Plant) – cold slop and condensate hold tanks, buffalo units with dust collectors, tanks D1-208, D1-209, F1-18, and F2E-9, the primary and secondary extraction columns for thorium and uranium, and a roof-mounted air handling unit. For Plant 8A (Recovery Plant) – rotary kiln, primary calciner with dust collector, Williams mill, sidelock filter housing, drum handling equipment, calciner, drum hood, dust collectors, oxidation furnace, and a roof-mounted air handling unit. For Building 3E (Hot Raffinate Building), which is a much smaller facility than Plant 2 and Plant 8 – the majority of miscellaneous piping and equipment will be in place. This equipment consists of tanks, pumps, and piping used to filter insolubles from raffinate solutions, UNH solutions, and slag leaching solutions. Together, the Building 3E items represent about 10 percent or less of the volume of material contained in the 20 percent overall estimate. The total quantities of process-related debris expected to be generated collectively from the three buildings is about 1,800 cubic yards, based on the planning estimate of about 60 roll-off boxes needed to containerize and transport this debris.

Commenting Organization: OEPA Commentor: Schneider
Section#: NA Pg.#: NA Line#: NA

Original Specific Comment #4

Comment: The proposal would generate well up to 20 or more times the amount of AWAC material within the pile during facility demolition (assuming the approved baseline approach removes all or less than 1% of process related equipment). However the proposal, while going into detail about management commitment to increase WAO if necessary (a commitment that should have always been in place), does not commit to any definitive additional WAO oversight. It would seem logical that such a large increase in the amount of AWAC material in a mixed pile would necessitate an increase in WAO staff. Additionally, the proposal doesn't detail how WAO will decide if more staff is needed. The entire proposal is based upon the success of visual observation of AWAC materials by WAO staff, the same staff having to find up to 20 times more unacceptable waste. The plan doesn't even discuss the addition of such visual cues as spray-painting the process related equipment a different color to make it more easily recognized.

Response: In WAO's view, as long as the field team continues to have adequate personnel dedicated to each piece of loadout equipment operating, then adequate oversight will be provided regardless of how many items actually get segregated out. The pace and amount of debris transferred with each individual loadout evolution are the key parameters to the rigor of the inspection process and the attendant demands for numbers of inspection personnel to be present. It is true that each piece may operate for a longer period of total time to accomplish

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the proper segregation under the revised approach, or multiple pieces may be necessary to complete the task (compared to the earlier historical approach), but the pace of each loadout evolution should not increase, and in fact may be slower. There is a finite amount of debris each piece of equipment can pick up with each evolution, and as long as the dedicated inspection person is present, he should have adequate opportunity to oversee the proper segregation of the items. Again, as noted in the letter, Scott Osborn is basing his inspection manpower requirements on the experience levels of his key personnel and the relationships developed over the past five years or so that this team has been together. As the above discussion indicates, each "full time equivalent" inspection representative may need to be out there longer to address the inspection requirements of the total task (i.e., if the durations are increased due to slower pace of each evolution), but will be accounted for with either longer field time for each individual, or adding additional field personnel as needed on a rotational basis to adequately cover the longer durations anticipated. It is Scott's main responsibility as leader of this effort to adequately balance his staff's field time via proper rotational assignments. The management commitment to provide the additional staff required that was referred to in the letter (and noted in the comment) has always been there, but was restated simply to reemphasize that Scott will be furnished with the staff he needs to accommodate the revision. Additionally, we wish to note that U.S. EPA had asked for an acknowledgment in the letter that our management's commitment remains firm to supplying adequate staff and ensuring the integrity of the WAO process. As an example of the effectiveness of this commitment, for this construction season WAO has requested and received approval to bring in four subcontractor personnel for D&D support and two subcontractor personnel for soil excavation support to supplement WAO staffing. The supplemental staff members have worked alongside and under the mentoring leadership of the key senior WAO staff members to effectively meet peak WAO field demands this season.

Regarding spray painting of the items, Scott Osborn and the D&D project personnel thought long and hard about the orange paint suggestion of Tom Ontko, and have concluded that it won't provide the benefits sought that an initial conclusion might indicate. WAO and D&D personnel completed a walkdown for this purpose and concluded that they cannot paint 100 percent of the equipment/piping beforehand due to accessibility, so therefore it is not a reliable tool since one still has to inspect every non-orange piece anyway to account for the less than 100 percent aspect. Therefore the paint does not necessarily result in the performance expected, and could lead to a false sense of identifying all potential hold-up material since all piping and equipment are considered suspect to begin with.

Commenting Organization: OEPA

Commentor: Schneider

Section#: NA

Pg.#: NA

Line#: NA

Original Specific Comment #5

Comment: Because the proposal so heavily relies on visual observation during the demolition process, details are essential to developing an acceptable plan. The proposal lacks in details and is too ambiguous to properly define a path forward. For example, where the removal of the building skin and subsequent chasing of a process pipe for removal could be acceptable, demolition of the entire structure into a mixed pile would not be. The plan fails to provide these kind of details; it simply refers to concurrent removal, which could be inferred to be more like the latter than the former approach.

Response: We anticipate that our response to Comment 1, where we clarify and emphasize our goal of targeted removal to the extent practical after additional access avenues are gained due to transite siding removal, helps alleviate the concern raised in this comment. As stated in that response, it is our goal to minimize the commingling of materials to the extent we can, recognizing that there will be situations where concurrent removal will occur.

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