

Arturo Duran asked for a synopsis of the status of some of the action items from the October 25, 1994 team meeting.

Gross Isotopic vs. Specific Radionuclide Analysis

Frazer Lockhart Reported that the DOE considers the data to be representative of the sludge material. Mr. Lockhart pointed out that the sludge samples were taken at different times and that the sludge in the SEPs is different chemically. The sludge data should not be compared with saltcrete data. The sludge in SEP 207-A had high contaminant concentrations, therefore, the concentration in pondcrete will reflect the high concentration.

The sludge concentrations in the B-series SEPs are lower than the SEP 207-A concentrations.

The DOE is working on a letter to the regulatory agencies describing the data.

OU4 Disposal Criteria vs. the DOE Complex Criteria.

Frazer Lockhart stated that the DOE is working on the issue. The question has been taken to the Waste Management Group in DOE for resolution. The anticipated answer is that the OU4 screening meets and exceed the criteria that the DOE complex-wide team is using for general screening. Harlen Ainscough pointed out that the RFETS still remains on the list from the DOE complex-wide screening process. Mr. Lockhart committed the DOE to providing a written response on this issue.

Part 14 Criteria

Frazer Lockhart stated that the DOE considers that this regulation is not an ARAR because the DOE is specifically excluded from the requirements. Harlen Ainscough indicated that the Radiation Control Division of the CDPHE was going to provide comments on the draft IM/IRA-EA Decision Document, and one of their comments was likely to request that the Part 14 criteria be met. It was pointed out by Mr. Lockhart that it was highly likely that the Part 14 criteria were met (even though they do not apply).

RESRAD Issue

Andy Ledford reported that a meeting would be established between Parsons ES and the CDPHE RESRAD modelers. Harlen Ainscough stated that Mr. Tom Pentecost and Mr. Don Simpson would be the CDPHE representatives. The meeting should be scheduled through Mr. Pentecost.

2) Phase II Work Plan

Arturo questioned if DOE was willing to meet the Colorado State Water Quality Standards at the point of compliance (POC), which would negate the need for a Baseline Risk Assessment.

Frazer Lockhart answered that the current state standards specific for the RFETS are too stringent, and that the DOE may prefer to perform a BRA. However, Mr. Lockhart stated that the DOE may investigate various alternatives for negating the need for a BRA in an attempt to accelerate the Phase II program.

It was discussed that there are unresolved issues associated with risk analysis, namely:

- 1) Risk analysis methodologies,
- 2) Land use scenarios for exposure scenarios, and
- 3) Establishment of an acceptable risk level.

Frazer Lockhart reported that the DOE has an ARAR working group investigating issues such as the point of compliance, and whether the state water quality standards are ARARs or to-be-considered requirements (TBCs).

Harlen Ainscough stated that if the Phase II program will include a BRA, then the CDPHE, EPA, and DOE need to meet to agree on the approach that will be utilized. It was agreed that it is premature to schedule a meeting on this topic at this time. Therefore, there will not be a specific team meeting established for discussing these issues or the BRA comments on the Phase II work plan.

3) IAG Milestone Schedule

Frazer Lockhart provided a table which summarized the costs of various alternatives and the number of months required for their implementation. He pointed out that the proposed alternative is significantly less costly than to ship the materials offsite. In addition, the time required to excavate, release from the site, and transport to a disposal facility may be similar to the duration to construct the proposed alternative (the time to package materials, and assay them for site release is significant).

Mr. Lockhart stated that the projected cost savings realized by extending the schedule for approximately one year, to include sludge/pondcrete, are 80 million dollars. Arturo Duran and Harlen Ainscough generally agreed that a year extension of the schedule was appropriate to allow DOE to include pondcrete and sludge as a component of the IM/IRA. Frazer Lockhart pointed out that site preparation construction would be ongoing during the time that the SEP closure/sludge and pondcrete processing design is underway. The following construction activities are required to be complete prior to the initiation of SEP closure construction:

- 1) Site equipment removal (non-RCRA),
- 2) Construction of a new access point through the security fences,
- 3) Removal of Buildings 788 and 964, and
- 4) Installation of utilities and fences to support the IM/IRA construction.

Mr. Lockhart continued that the DOE is planning to expedite the construction start date through the following methods:

- 1) Preparing the design in parallel with the public review period.
- 2) Overlapping the 60 and 90 percent design so there is no break in the design activities between the 60 percent submittal and commencing 90 percent design, and
- 3) Early contractor procurement, by issuing an early design package to subcontractors for a unit price bid.

Harlen Ainscough stated that a 21 day period to review and approve the final design package was not appropriate unless the CDPHE was cognizant of the design throughout the design process. It was agreed that the CDPHE and EPA would be provided with a copy of the 60 and 90 percent review packages for information and comment. The agencies would have to comment within the internal DOE comment period if their comments are to be incorporated. It was agreed that this process should expedite the final review and approval process.

The DOE will formally transmit the new IAG milestones to the CDPHE and the EPA for ratification during the week of November 14, 1994.

4) DOE/CDPHE Positions Concerning Dispositioning Pondcrete

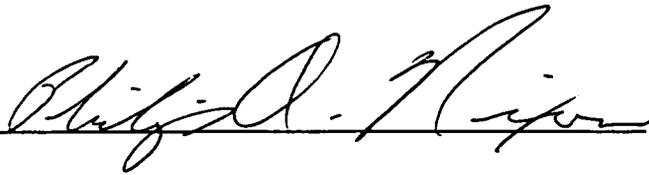
Frazer Lockhart stated that the pondcrete can be consolidated beneath the engineered cover because it is remediation waste. The SEPs have been undergoing closure since 1986. SEP operations ceased in 1986, and the SEPs received interim status for closure. Rockwell International was fined for disposing wastes in the SEPs after 1986. The fine was levied because the SEPs did not have interim status for operation. Since the SEPs have been in the closure mode since 1986, the pondcrete is considered remediation waste and can be consolidated within the CAMU.

Harlen Ainscough responded that the CDPHE position is that pondcrete is not remediation waste because it has already been removed and treated for disposal, and is not interfering with the OU4 closure. The CDPHE considers pondcrete to be as-generated waste (as opposed to remediation waste).

5) Geotechnical Analysis Synopsis

Phil Nixon provided a technical synopsis of the geotechnical investigation results to comply with the request from the CDPHE/EPA during the dispute technical baseline re-evaluation. Mr. Nixon stated that excellent samples were collected, and that the results were used in a sophisticated computer code called XSTABLE for stability analysis. Samples were taken from the OU4 hillside and a point away from OU4 where slumping is known to have occurred. Four different scenarios were modeled to investigate the factor of safety for stability under different failure scenarios. The analyses were conservative. Based on the known conditions and basis

of the calculations, the resulting factors of safety exceeded the requirements with the exception of a few conservative scenarios that were not reflective of the actual site conditions. Mr. Nixon stated that Parsons ES was not proposing to engineer geotechnical stabilizing measures at this time. Mr. Nixon noted that the analysis was preliminary based on the conceptual configuration of the engineered cover. The model will have to be re-run when the final engineered configuration is completed. In addition, Parsons ES is comparing the geotechnical logs with the Phase I RFI/RI logs to determine if the geotechnical analysis has studied a representative sample of the OU4 field conditions. Parsons ES may also review Phase II logs as they become available to ensure that this study provided adequate information. It was agreed that no further sampling was required by the CDPHE and EPA.

A handwritten signature in cursive script, reading "Philip A. Nixon", is written over a horizontal line.

Philip A. Nixon