

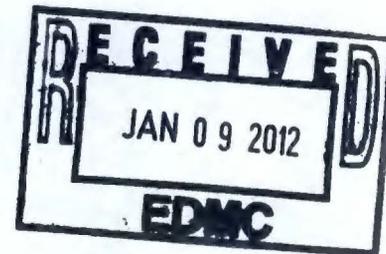
United States Government

Department of Energy

Richland Operations Office

memorandum

DATE: **JAN 03 2012**
 REPLY TO
 ATTN OF: AMRC:RFG/12-AMRC-0057
 SUBJECT: REMOVAL ACTION OF THE 1902D WATER TOWER
 TO: Memorandum-to-File



- References:
- (1) Document, "Removal Action Work Plan for River Corridor General Decommissioning Activities," Revision 0, DOE/RL-2010-34, dtd. May 2010. *0088780*
 - (2) Administrative Record Document, "TPA Change Notice Form TPA-CN-310, DOE/RL-2000-57, Rev 2 Removal Action Work Plan for the 105D and 105H Interim Safe Storage Projects and Ancillary Buildings," TPA-CN-310, dtd. November 9, 2009. *0098303*
 - (3) Administrative Record Document, "Change Notice for Modifying Approved Documents Work Plans in Accordance with the Tri-Party Agreement Action Plan Section 9.0 Documentation and Records, DOE/RL-2000-57, Rev 2 Removal Action Work Plan for the 105D and 105H Interim Safe Storage Projects and Ancillary Buildings," TPA-CN-286, dtd. July 14, 2009. *0084840*
 - (4) Administrative Record Document, "Action Memorandum for 105D and 105H Reactor Facilities and Ancillary Facilities," D8566146, dtd. January 5, 2001. *0054298*
 - (5) Administrative Record Document, "Action Memorandum for 105D and 105H Reactor Facilities and Ancillary Facilities," D8566579, dtd. December 8, 2000. *0054299*

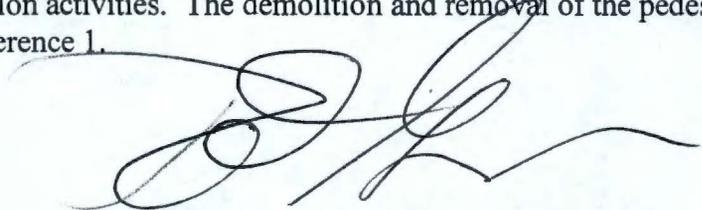
Reference 2 and Reference 3 added the demolition of the 1902D to DOE/RL-2000-57, "Removal Action Work Plan for the 105D and 105H Interim Safe Storage Projects and Ancillary Buildings". 1902D was an abandoned steel water tower supported on an open frame that had been abandoned as a derelict portion of the 100D raw water system.

The steel superstructure and tank of the 1902D were demolished; the pedestals for the 1902D support frame still remain in place. The superstructure and tank demolition debris was disposed at the Environmental Restoration and Disposal Facility in accordance with TPA-CN-286 and TPA-CN-310 and their associated removal action work plan.

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A review of the action memorandum has revealed that the plug-in approach was not specifically authorized by the 105D action memorandum. The 1902D superstructure and tank were eligible for inclusion in Reference 1, but was erroneously placed in Reference 2. Additionally, the 1902D tank and superstructure did not undergo the National Environmental Policy Act review process as the work was performed under the incorrect removal action document. This type of work would normally be performed under a Categorical Exclusion, due to the absence of hazards, but the facility was not specifically analyzed under the nation Environmental Policy Act process.

The U.S. Environmental Protection Agency has advised the U.S. Department of Energy that facilities may not be added to Reference 1 after work is completed. This memorandum to file documents that the same process outlined in Reference 2 was used to perform the 1902D tank and superstructure demolition activities. The demolition and removal of the pedestals for 1902D will be added to Reference 1.



R. F. Guercia, 300 Area Subproject Director
River Corridor Project

cc:

Administrative Record, H6-08

F. W. Bond, Ecology, H0-57

R. W. Russell, ORP, H6-60