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Department of Energy
Richland Operations Office
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APR 16 1990

90-RB-70

Mr. Paul T. Day
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Dear Messrs. Day and Nord:

EXPEDITING THE REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORK PLAN PROCESS

This letter is written in response to the letter from Messrs. Paul Day and Roger Stanley to me, dated January 22, 1990, same subject as above. In general the Department of Energy, Richland Operations Office, (DOE-RL) is in agreement with the proposals outlined in your letter. The process of implementing the proposals is underway and is discussed in the following.

The general approach of streamlining the RI/FS work plan process outlined in your letter consists of two primary changes, compared to present practices. The first change is to initiate dialogue with the regulators early in the work plan preparation process. The advantages of this are summarized well in the enclosure of your letter. The second change is to conduct parallel reviews of work plans with the regulators at the same time that they are reviewed by DOE (RL, HQ, and support contractors). The amount of time that this could save is also addressed in the enclosure to your letter. We believe that savings of 3 to 6 months are probable.

In your letter, you suggested a test case to evaluate the overall efficiency of the expedited process, based on the 100-KR-1 and 100-KR-4 work plans. DOE-RL has accepted this proposal, and invited the U. S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) to participate in the "conceptual model" meeting just conducted. Messrs. Doug Sherwood and Dave Einan of EPA participated in this meeting. In addition to this test case involvement, and based on discussions at the Unit Manager level, DOE-RL proposes the following general strategy:

- three early interface meetings: 1) the kick-off meeting for preparation of the Work Plan; 2) the review of the conceptual model for the Operable Unit (OU); and 3) the next critical point in the preparation of the work plan as determined through discussions with the EPA/Ecology

- parallel reviews as proposed.

Interface meetings have already been held for 100-BC-1, 100-BC-5, 100-KR-1, and 100-KR-4 work plans. Conceptual model reviews for 100-KR-1 and 100-KR-4 were recently conducted with EPA/Ecology invited to participate. EPA/Ecology will also be notified of a kick-off meeting for 100-NR-1 and 100-NR-3 operable units to be held on April 19, 1990. Finally, the overall schedule for work plan preparation is being assessed to notify you of other meetings in the above categories for all operable units. This information will be communicated to you.

Regarding parallel reviews of work plans, based on discussions with EPA/Ecology unit managers, drafts of work plans prepared by Westinghouse Hanford Company for 100-BC-1 and 100-BC-5 were transmitted by DOE-RL to all parties, including EPA and Ecology, for review on April 10, 1990. The decision on second regulatory review on these two work plans can be addressed after the initial review is complete. It is assumed that review periods for DOE and regulators will remain the same. Plans for submission of additional work plans are as follows:

Work Plan	DOE/Regulatory Review
100-KR-1 & 4	May 31, 1990
100-NR-1 & 3	September 31, 1990

The overall work plan preparation schedule is also being assessed to notify you of other planned work plan reviews. This information will be provided in unit manager/project manager meetings, along with the schedules for interface meetings.

We appreciate your suggestions and efforts to make the work plan preparation process more efficient. Please call me (376-6798) or Mr. R. K. Stewart (376-6192), of the Environmental Restoration Branch, if you have any questions about this letter or activities underway to achieve this objective.

Sincerely,

Steven H. Wisness
Environmental Restoration Division

ERD:RKS

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Subject: EXPEDITING THE REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORK PLAN PROCESS

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