

United States Government

Department of Energy

Richland Operations Office

memorandum

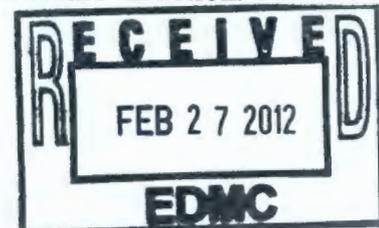
DATE: FEB 23 2012
 REPLY TO
 ATTN OF: AMRC:RFG/12-AMRC-0095

SUBJECT: MEMORANDUM TO FILE: REMOVAL ACTION OF MOBILE OFFICE MO-829

TO: Memorandum-to-File

- References:
- (1) DOE/RL-2010-34, "Removal Action Work Plan for River Corridor General Decommissioning Activities," Revision 0, dtd. May 2010.
 - (2) Administrative Record Document 0093386, D4-100N-0022, "Facility Status Change Form," dtd. March 10, 2010. 0101510
 - (3) Administrative Record Document DA03629175, "Removal Action Work Plan for 100-N Ancillary Facilities," dtd. March 16, 2006. 0070720
 - (4) Administrative Record Document D199017700, "100-N Area Ancillary Facilities Action Memorandum," dtd. January 6, 1999. 0050149
 - (5) Administrative Record Document D199017702, "Action Memorandum 100-N Area Ancillary Facilities," dtd. December 17, 1998. 0050150
 - (6) Administrative Record Document D198056145, "DOE/RL-97-22 Engineering Evaluation/Cost Analysis for the 100-N Area Ancillary Facilities and Integration Plan," Rev. 1, dtd. March 1998. 0048685

MO-829 was a mobile office that had been sited at 100-D and then driven to 100-N and eventually demolished in the 100-N Laydown Area. Table B-1 of the "Engineering Evaluation/Cost Analysis for the 100-N Area Ancillary Facilities and Integration Plan," provided a list of facilities in the 100-N Area that were analyzed for removal action. Additionally, Table B-2 of the "Engineering Evaluation/Cost Analysis for the 100-N Area Ancillary Facilities and Integration Plan," provided a list of facilities specifically not addressed in analysis as they were either excessed/demolished, not contaminated, sanitary sewer systems, or still active. Table 1 of the 100-N Ancillary Facilities Action Memorandum provided a list of facilities specifically addressed as the approved removal action.



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A review of the action memorandum has revealed that the plug-in approach was not specifically authorized by the 105-N ancillary facilities action memorandum. The subject building was eligible for inclusion in the "Removal Action Work Plan for River Corridor General Decommissioning Activities," but was erroneously demolished using the guidelines of the "Removal Action Work Plan 100-N Ancillary Facilities." Additionally, the subject facility did not undergo the National Environmental Policy Act (NEPA) 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 NEPA process.

The U.S. Environmental Protection Agency has advised the U.S. Department of Energy Richland Operations Office that facilities may not be added to the "Removal Action Work Plan for River Corridor General Decommissioning Activities," after work is completed. This Memorandum-to-File documents that the process of "Removal Action Work Plan for 100-N Ancillary Facilities," Rev 2, was used to perform the demolition and disposal of the subject facility. Closeout was documented in the Administrative Record via Facility Status Change Form D4-100N-0022.



R. F. Guercia, Field Engineering
River Corridor Closure Project

cc: R. W. Russell, ORP H6-60
Administrative Record, H6-08