START

0012537

MEETING MINUTES

Subject: IMPLEMENTATION PROCESS FOR PERFORMING RADIOLOGICAL SURFACE CONTAMINATION REMOVAL/STABILIZATION ACTIVITIES IN THE 300-FF-1 OPERABLE UNIT

TO: Attendees and Distribution BUILDING: Richland EPA Office

FROM: F. W. Gustafson CHAIRMAN: R. K. Stewart

Dept-Operation-Component	Area	Shift	Meeting Date	Number Attending
Environmental Engineering Remedial Action Section	3000	Days	January 15, 1991	5

The intent of this meeting was to resolve issues concerning the implementation process for performing radiological surface contamination removal/stabilization activities in the 300-FF-1 Operable Unit (OU).

The radiological contamination removal/stabilization activities were initially planned to be completed through the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Interim Response Action (IRA) process, based on discussions with the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology). This process involves completing an IRA Proposal which contains an engineering evaluation/cost analysis of the response actions being considered. This proposal would then undergo both regulatory and public review cycles prior to activities being approved for implementation by the regulators.

By performing the removal/stabilization activity as an IRA, a categorical exclusion to preparing National Environmental Policy Act (NEPA) documentation was possible, facilitating early conduct of the work. Additionally, the EPA wanted to ensure that the activities were appropriately documented and would not impact the remedial investigation (RI) tasks scheduled for the OU. The IRA process would insure that EPA's concerns are addressed.

An alternative to the CERCLA process, performing the activities as a surface radiation removal project under the Radiation Area Remedial Action (RARA) Program, was considered. It was believed that a long delay in performing the removal and stabilization work would be encountered because of a current problem at DOE-HQ regarding NEPA compliance for portions of the RARA program (having to do with stabilization activities of large areas). Because of this concern, this alternative initially was rejected.

During the final review phases of the project within the Department of Energy-Richland Operations Office (DOE-RL), it was realized that precedence could be set to perform IRAs at other surface contamination sites and to perform other ongoing surface decontamination work at Hanford under the CERCLA process should the 300-FF-1 radiological contamination work be performed in this manner. This realization caused concern about potential delays in this other work and led to discussions within DOE-RL regarding alternative processes for performing this work. These discussions in turn led to an understanding that the surface removal activities conducted in the RARA program are very similar to ongoing surface contamination removals being performed in Hanford operational programs. Because of this similarity, it was determined that it would be appropriate to conduct the 300-FF-1 surface contamination removal work as a RARA task, under Atomic Energy Act (AEA) authority. NEPA compliance could best be achieved via a Categorical Exclusion (CX) permitting this type of operational activity.

This understanding formed the basis for discussions with EPA in this subject meeting. At the meeting it was agreed that the 300-FF-1 surface radiation removal/stabilization activities would be performed under the authority of the RARA program, as suggested by DOE-RL. Additional requirements, as documented in these meeting minutes, not normally associated with the RARA program activities, will be implemented. These requirements will ensure that the activities to be performed are appropriate and will not interfere with the ongoing RI activities.

As agreed, the following process will be followed in completing the radiological contamination removal/stabilization activities in the 300-FF-1 OU:

1) An Engineering Plan, to be considered a secondary document in accordance with the Tri-Party Agreement, will be prepared. This plan will evaluate the alternatives being considered, select the preferred alternative(s), and provide a work plan detailing how the alternative(s) will be implemented.

2) The Engineering Plan will be submitted to the regulatory agencies for a 30 day review and comment period. Once the comments have been appropriately dispositioned, the regulatory agencies will provide formal concurrence that the activity proposed in the Engineering Plan be implemented.

3) Upon conclusion of the field activities, a final report (also considered a secondary document by the Tri-Party Agreement will be prepared. This report will detail the accomplishments of the removal/stabilization activity. This report will be provided to the regulatory agencies.

4) These activities, including copies of the Engineering Plan and the final report, will be documented in the Administrative Record established for the 300-FF-1 RI.

Actions to be taken as a direct result of this meeting include:

1) The Environmental Engineering Remedial Action Section, under the guidance of NEPA documentation section, will revise the NEPA information bulletin to document the change in the implementation strategy from being applicable to a NEPA categorical exclusion under CERCLA removal authority to a CX under AEA authority.

2) DOE-RL will revise the draft CX Determination letter which may be used to officially document DOE's concurrence that the proposed removal/stabilization activity meets the requirements for the specified CX.

Attendees

P. F. Dunigan, Jr., DOE-RL	A5-19
D. R. Einan, EPA	B5-01
F. W. Gustafson	H4-55
W. L. Johnson	H4-55
R. K. Stewart, DOE-RL	A5-19

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
F. W. Gustafson, 6-1736	Attendees & Distribution	81225-91-003

Subject: IMPLEMENTATION PROCESS FOR PERFORMING RADIOLOGICAL SURFACE CONTAMIANTION REMOVAL/STABILIZATION ACTIVITIES IN THE 300-FF-1 OPERABLE UNIT

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	
		W. C. Alaconis	L4-92	
		P. F. Dunigan, Jr.	A5-19	
		D. R. Einan	B5-01	
		L. Goldstein (Ecology)		
		F. W. Gustafson	H4-55	
		W. M. Hayward	R2-77	
		M. C. Hughes	L4-88	
X WJ Johnson	1/30/91	W. L. Johnson	H4-55	
		M. A. Mihalic	L4-88	
		R. K. Stewart	A5-19	
		EDMC (300-FF-1 OU Administrative Record)	H4-22	