

I-5. OPERABLE UNIT INFORMATION ASSESSMENT OPERATING INSTRUCTIONS¹

In order to document the process by which all classified information is identified and handled on the Oak Ridge Reservation and to insure the Federal Facility Agreement (FFA) parties of the completeness of the information used for the development of the Record of Decision, a Operable Unit Information Assessment document will be developed as a secondary document for each operable unit (OU). This document will, in some cases, contain classified information and in all cases be developed for every OU (excluding Interim RODs for OUs completed prior to October 30, 1993).

The OU activities are as follows:

I. REQUIREMENTS

Upon approval of this operating instruction or the initiation of CERCLA activities at an OU, the OU project manager will make the project team aware of the requirement for the generation of the Operable Unit Information Assessment document that contains, as a minimum, the following information:

A. Selection Process and Criteria

1. An explanation of the process used to identify all related OU information: classified and unclassified. This includes the project team involved in the information search, how interviewees were identified, where literature searches were performed, etc.
2. An explanation of the process used by the project team to identify and select the relevant OU information to be used to support the activities leading to the Record of Decision (ROD).

B. Classified Document/Material list

1. The project team will perform interviews of any individuals with knowledge of historical and present operations within the boundaries of the OU. The person(s) and nature of all interviews will be recorded for potential use at the Remedial Investigation (RI) scoping workshop or at routine project working meetings. Any classified interviews will be included in the Operable Unit Information Assessment document list.
2. The project team will perform an exhaustive literature search for documents/materials related to the OU. All classified and unclassified documents/materials containing information related to the OU will be identified in the Operable Unit Information Assessment document list. All information determined to be pertinent is to be identified for potential use at the RI scoping workshop.

C. Relevance of the Classified Information to CERCLA

1. Provide rationale for any item in the Operable Unit Information Assessment document list (see I.B.) determined to be unnecessary or irrelevant to the performance of the OU Remedial Investigation/Feasibility Study activities. For classified compounds of concern eliminated from consideration, provide detailed information, including

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analytical analysis processes and the pathway screening steps (including location(s), potential for release, quantities, material accountability procedures, and applicable references/interviewees) followed to support removal of the compound as a concern to the environment.

2. For relevant classified compounds of concern in the Operable Unit Information Assessment document, identified during the C.1 screening process, provide detailed information including analytical analysis processes and the pathway screening steps (including location(s), potential for release, quantities, material accountability procedures, and applicable references/interviewees) followed to support the CERCLA required objectives.
3. For any item in the Operable Unit Information Assessment document list determined to be necessary and relevant to the CERCLA activities performed at the OU, provide an explanation of how this classified information will be addressed in the documents generated and whether a sanitized version or an abstracted version of the primary documents will be provided for unclassified review purposes.
4. Relevant information from classified sources used in FFA primary or secondary documents will comply with the Referencing Classified Documents Operating Instructions.

II. IMPLEMENTATION

- A. For new OU activities (prior to RI scoping workshop), the unclassified documentation generated in the performance of steps I.A. and I.B. above will be provided to the FFA parties prior to the workshop along with the environmental monitoring data summary as required in step 2 of the Remedial Investigation Scoping Workshop Operating Instructions. During the RI scoping workshop, the classified information in the Operable Unit Information Assessment document will be made available, at an appropriate location, to those personnel with the proper clearance level and determined to have a 'need to know'. The Operable Unit Information Assessment document will be maintained and updated until the signing of the ROD.
- B. For OUs past the RI scoping workshop phase, the Operable Unit Information Assessment document will be developed, in accordance with the requirements in I. above pertaining to classified information, and will be maintained and updated until the signing of the ROD.

III. AVAILABILITY

- A. The maintained Operable Unit Information Assessment document for each OU will be available at the site upon request by the FFA parties' staff with appropriate level of clearance. The Operable Unit Information Assessment document will be incorporated into the OU Administrative Record file.