

I-6 Document Scheduling Operating Instructions

The document review protocol (p. I-6c through I-6f) will be followed for the development of Federal Facility Agreement (FFA) primary, secondary, and removal action documents produced for the Oak Ridge Reservation (ORR) Environmental Restoration Program.

The D1 and D2 documents are defined within the FFA Section II. FFA Section XXI.C&D provides the ORR listing of primary documents and a listing of secondary document examples. The Environmental Protection Agency (EPA) and Tennessee Department of Environment and Conservation (TDEC) document review periods for D1 and D2 documents are specified in the FFA Section XXI.G.2, with DOE's response to comments period specified in Section XXI.G.5. Removal Actions are addressed in the FFA Section XIII. The following protocol will be followed for all Remedial and Removal Actions.

Remedial Action Scheduling Operating Instructions:

- The technical work performed during field work activities, laboratory analysis and interpretation, and the scope of the project will directly affect the time required to develop the report initiating the review cycle protocol. The technical complexity of the site should be initially established at the project scoping workshop performed under the Remedial Investigation Scoping Workshop Operating Instructions (I-4 Remedial Investigation Scoping Workshop Operating Instructions).
- The Remedial Investigation Report and the Feasibility Study should either 1) be developed for delivery as one document or 2) if two documents are produced, the Feasibility Study (D1) should be scheduled for delivery within one month after the Remedial Investigation Report (D2) is developed in response to EPA and TDEC comments.
- The Proposed Plan (D1) should be scheduled for delivery to EPA and TDEC closely (within one to two months) following the transmittal of the Feasibility Study (D2) document, unless dispute is invoked on the D2 FS.
- The Record of Decision (D1) should be scheduled for delivery to EPA and TDEC within one month, unless significant public comment requires an extension request, following the completion of the public review period of the Proposed Plan. Within the first month following the public review period, the three parties will meet to discuss the public's comments and the comment resolutions.
- Remedial Action Design and/or Work Plan documents should define the remedial action schedule, including the anticipated dates for both the Construction Start and the Construction Completion. DOE will provide construction start information at the scheduled Core Team (CT) meetings. The DOE CT representative will notify via email the EPA and TDEC CT representatives of the start of construction as defined during the CT meeting.
- The Remedial Action (RA) Report will be scheduled for delivery within 3 months of the completion of the final remedial action activity performed under the ROD. Phased Construction Completion Reports (PCCR) will address the interim remedial actions and will be scheduled for completion within three months of the completion of the phased remedial action.

Removal Action Scheduling Operating Instructions:

- Once adequate information has been evaluated to determine the need for a removal action, occasionally requiring investigatory field characterization work, the rationale supporting the performance of an Emergency, Time Critical or Non-Time Critical Removal Action will be documented and/or communicated to the Regulators.
- Time Critical Removal Actions (TCRmA): The D1 version of the Action Memorandum (AM) should be submitted to EPA/TDEC within 6 months of the TCRmA determination. The removal action activities should be underway within 6 months of the identification of the time-critical removal action. This document is reviewed by EPA/TDEC and significant comments may be incorporated into a D2 DOE signed document and/or in a comment resolution package transmitted back to the EPA/TDEC along with the Public notice responsiveness summary. There is a thirty-day public review of the Action Memorandum. Any comments received from the public are documented and resolved for inclusion in the Administrative Record with the AM and transmitted to EPA/TDEC.
- Non-Time Critical Removal Actions (NonTCRmA): The D1 version(s) of the EE/CA and the associated Public Notice format should be transmitted to EPA/TDEC within 9 months of their receipt of the NonTCRmA determination. This document is reviewed by EPA/TDEC and significant comments may be incorporated by DOE. A revised EE/CA document (D2) is signed and/or comment resolution package is transmitted back to the EPA/TDEC. There shall be a thirty-day public review of the EE/CA. Any comments received from the public shall be documented and resolved for inclusion in the Action Memorandum.
- The Action Memorandum is submitted to the EPA/TDEC for review following the comment resolution of the public review. This document is reviewed by the EPA/TDEC and comments may be incorporated into a D2 DOE signed document and transmitted back to the EPA/TDEC for agreement.
- Removal Action Work Plans are to be provided to EPA/TDEC for review. Removal Action Work Plan documents should define the remedial action schedule, including the anticipated dates for both the Construction Start and the Construction Completion. DOE will provide construction start information at the scheduled Core Team (CT) meetings. The DOE CT representative will notify via email the EPA and TDEC CT representatives of the start of construction as defined during the CT meeting.
- Removal Action Reports (RmARs) and phased construction completion RmARs are necessary for all types of Removal Actions and are considered a primary FFA document (serves the same purpose as the Remedial Action Report). This ensures that the completed work will be satisfactory to the three parties and can be incorporated into future RODs necessary to the site. The Review Cycle Protocol for the Remedial Action Report primary document is to be followed.