

PREDECISIONAL DRAFT



MIAMISBURG ENVIRONMENTAL MANAGEMENT PROJECT



PERFORMANCE MANAGEMENT PLAN FOR ACCELERATING CLEANUP JULY 31, 2002

(Note: This Plan has been approved by the Assistant Secretary for Environmental Management, Jessie Roberson, submitted to the Office of Management and Budget, August 2002)

PREDECISIONAL DRAFT

Miamisburg Environmental Management Project Performance Management Plan

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Acronyms and Abbreviations

| | |
|--------|--|
| AEA | Atomic Energy Act |
| ATMX | Atomic Materials Rail Transfer |
| CERCLA | Comprehensive Environmental Response, Compensation and Liability Act of 1980 |
| CPIF | Cost Plus Incentive Fee |
| CRA | Cleanup Reform Account |
| D&D | Decontamination & Decommissioning |
| D&T | Decontamination & Transition |
| DOE | U. S. Department of Energy |
| DOT | U. S. Department of Transportation |
| DP | Defense Programs |
| EM | Environmental Management |
| ISM | Integrated Safety Management |
| FFA | Federal Facilities Agreement |
| LTS | Long Term Stewardship |
| MEMP | Miamisburg Environmental Management Project |
| MMCIC | Miamisburg Mound Community Improvement Corporation |
| NE | Nuclear Energy |
| NESHAP | National Emissions Standards for Hazardous Air Pollutants |
| NPL | National Priorities List |
| NTS | Nevada Test Site |
| OEPA | Ohio Environmental Protection Agency |
| OU | Operable Units |
| PBS | Project Baseline Summary |
| PMP | Performance Management Plan |
| PPE | Personal Protective Equipment |
| PRS | Potential Release Site |
| ROD | Record of Decision |
| RRE | Residual Risk Evaluation |
| SRS | Savannah River Site |
| TERF | Tritium Effluent Recovery Facility |
| TRU | Transuranic |
| USEPA | U. S. Environmental Protection Agency |
| WIPP | Waste Isolation Pilot Plant |
| WBS | Work Breakdown Structure |

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Executive Summary

In June 2002, DOE, the Ohio Environmental Protection Agency (OEPA) and the U. S. Environmental Protection Agency (USEPA) signed a letter of intent formalizing an agreement to accelerate the Mound Facility cleanup. The letter provides the foundation for a renewed focus on continuous improvement throughout cleanup with the objective of accelerating completion and increasing the confidence level in a 2006 or sooner cleanup date. This Performance Management Plan (PMP) implements the letter of intent and is submitted as part of the plan and framework for accelerating site remediation work in Miamisburg, Ohio. The ultimate goal is to attain five months acceleration in site closure, reduce risk, save the Department of Energy additional costs through mortgage reduction, and remain in compliance with enforceable milestones for closure by December 2006.

To achieve the MEMP goal, two objectives and four implementing initiatives have been developed.

The objectives are:

- 1) Change existing contract to a CPIF contract
- 2) Accelerate the cleanup critical path schedule with priority given to reducing radiological source term inventories.

The four implementing initiatives that support the second objective are as follows:

- Acceleration of Facility Deactivation and Decommissioning
- Acceleration of Soils Remediation
- Acceleration of Waste Disposal
- Optimization of Project Support to Facilitate Accelerations

This PMP provides background information explaining the basis of each implementing initiative's benefits and metrics to be accomplished. These initiatives also are aligned within the current Project Baseline Summary (PBS) structure.

Significant Note:

The Miamisburg Environmental Management Project (MEMP) is currently in a procurement process for changing the current contract to a Cost Plus Incentive Fee (CPIF) contract to create the motivation for the contractor to accelerate site cleanup and closure. The information and costs described in this PMP could change as a result of the contract recompetition process.

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1. Introduction

This document presents the PMP for the Mound Closure Project located in Miamisburg, Ohio. The PMP outlines the objectives, strategies and initiatives to accelerate closure of Mound by 2006; incorporates changes required by the Top-to-Bottom Review and satisfies the National Defense Authorization Act (HR 4546) which calls for a high-level plan to define activities and benefits of accelerated cleanup at this site.

2. Purpose

The purpose of this PMP is to delineate the strategy and complementary actions to complete the project by 2006 and provide a means to measure progress. The re-engineering concepts identified in FY 2001 and executed in FY 2002 will align with DOE's Top-to-Bottom Review recommendations. Progress to date from implementation of the re-engineering concepts in FY 2002 is providing added assurance that acceleration is achievable. This plan, coupled with letters of intent for the Federal Facilities Agreement enforceable milestones and the new CPIX contract, will provide the framework for all parties to support the objective to accelerate the project cleanup to 2006 or earlier.

3. Background

The Mound site is located in Miamisburg, Ohio, ten miles south of Dayton on initially 306 acres. The plant was built in the late 1940's to support research and development, testing, and production activities for the Department's defense nuclear weapons complex and energy research programs. This mission continued until 1994, when these activities were transferred to other DOE facilities. The Mound Plant mission involved production of components which contained plutonium-238, polonium-210 and tritium, and large quantities of high explosives. As a result of these past operations, some buildings, soils and groundwater are contaminated with radioactive and hazardous chemicals. The USEPA placed the site on the National Priority List (NPL) in 1989 because of chemical contamination present in the site groundwater and due to the site's proximity to a sole source aquifer. DOE signed a Federal Facility Agreement (FFA) for the remediation of the site with the USEPA in 1990. In 1993, the FFA became a tri-party agreement through the addition of the OEPA. The purpose of the FFA was to establish a procedural framework and schedule for developing appropriate response actions and facilitate cooperation and exchange of information. On September 30, 1994, the DOE Defense Programs (DP) mission ceased and DOE/EM became the "owner" of the Mound site on October 1, 1994. Transferring the DP mission to other sites and removing the DP inventories was the major emphasis for both DP and EM for the next three years.

Initially, the remediation of MEMP was organized around nine Operable Units (OU), each of which included several Potential Release Sites (PRS). PRSs are discrete areas at the MEMP site where knowledge of historic or current uses indicates that radioactive and/or hazardous materials may have been released into the environment. However, the OU approach was found to be inefficient for MEMP because the environmental problems at the site were discrete and not interrelated. DOE and its regulators, instead, decided to evaluate each PRS or building separately, and use DOE's removal action authority under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) to remediate the PRSs and the buildings, as needed. This PRS or building approach was called the "Mound 2000 Process." Once individual PRSs and buildings in a particular land parcel are remediated, a residual risk evaluation (RRE) is conducted to evaluate the cumulative impact of any residual contamination within that land parcel to ensure that the parcel, as a whole, does not pose an unacceptable risk to human health and the environment under an industrial use standard.

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This process has been fully executed with satisfactory results. Regulators are seeing cleanup progress and the MMCIC is receiving buildings that can then be leased to accelerate economic development of the site. The MMCIC is also receiving land and buildings via quit claim deed transfers.

In 1998 the site was sold to the MMCIC through a Sales Contract, and the first parcel of land was transferred in February 1999. Additional parcels were transferred in August 1999 and April 2001, and a fourth parcel is scheduled for transfer by the end of FY 2002. At that time, over 40% of the property destined for eventual transfer to the MMCIC will have been transferred. The Mound 2000 Process and the re-engineered approach to cleanup have resulted in significant progress and have provided a proven base to achieve the initiatives outlined in this PMP.

To complete the transfer, an additional 184 acres and the associated buildings must be dispositioned by 2006. This requires the following high level activities to be accelerated:

- Ship 300 cubic meters of TRU waste to Savannah River
- Deactivation of tritium process equipment in the three tritium facilities (Buildings SW, R, and T)
- Demolition of five key radiological buildings (38, HH, WD, SW, and R)
- Complete assessment of 26 soil potential release sites
- Complete remediation of 45 soil potential release sites
- Ship approximately 125,000 cubic meters of low level waste to offsite disposal sites

For these key activities, the focus will be to reduce risk to public health, workers, and the environment by accelerating those work activities that present the risk.

4. End State

MEMP expects to complete all remediation activities at MEMP by December 2006, or earlier. To accomplish this goal, the following will be completed:

- All facilities will be demolished or deactivated and transferred to the MMCIC for industrial reuse
- Utility structures and components will be removed as negotiated with the MMCIC
- All known PRSs, including those associated with buildings, land, pipes and structures, will be investigated, remediated as required, closed and documented
- The site landscape will be restored with all debris and extraneous material removed
- All Records of Decision (RODs) will be accepted
- All remaining property will be transferred to the MMCIC by deed
- The Long Term Stewardship Plan will be accepted by all parties

Any residual contamination left onsite will be below levels satisfactory for an industrial use standard. Because the site will have residual contamination, DOE has imposed deed restrictions that will remain attached to the land, regardless of who owns the property. Deed restrictions imposed on land parcels transferred to date

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include: soil cannot be removed offsite without prior regulatory approval, groundwater may not be used without prior regulatory approval, and the land use must stay industrial. The above is meant to be a summary only. The RODs for individual land parcels contain much more detail on the deed restrictions. Future land parcels may (or may not) have additional deed restrictions imposed on them. The deed restrictions are used to ensure protection of human health and the environment for as long as residual contamination levels warrant.

For purposes of land transfer, a team comprised of representatives from the DOE/MEMP, USEPA, and OEPA recommends when a land parcel is ready to be transferred to the MMCIC. The Mound 2000 Process includes several opportunities for public review and comment before a land parcel is finally transferred. This same land transfer process is expected to continue until all parcels have been transferred to the MMCIC.

The MMCIC is a non-profit corporation established by the City of Miamisburg to redevelop and reuse the Mound site, as well as transfer Mound assets for reuse. The MMCIC's primary roles are ensuring the former DOE Mound site is converted to its best use, achieving the economic development objectives of the community, and replacing the economic and fiscal losses that were caused by DOE's closure of the facility. DOE involves the MMCIC, as the future landowner, throughout the land transfer process. MMCIC is treated as a key participant throughout both the real estate and the CERCLA processes. Parcels may not be transferred to MMCIC until the USEPA and OEPA concur that the parcel is protective of human health and the environment under an industrial use standard.

The Sales Contract excludes real property needed for the DOE's ongoing Nuclear Energy (NE) mission, as well as buildings slated for demolition as part of the EM cleanup mission. DOE had the full capacity, power and authority to enter into the sales contract pursuant to the Atomic Energy Act (AEA). The DOE/MEMP, USEPA, OEPA and the MMCIC have all agreed that the site will be cleaned to an industrial use standard. DOE agreed to convey the site by discrete parcels, subject to coordination with the USEPA and OEPA pursuant to CERCLA. DOE conveys a quit claim deed to the MMCIC with the transfer of each land parcel.

5. Strategic Overview

The DOE/MEMP strategic goal is to remediate the Mound site and transfer the site to the MMCIC by 2006, or earlier. To accomplish this goal, two primary objectives must be achieved:

- 1) Change existing contract to a CPIF contract
- 2) Accelerate the cleanup critical path schedule with priority given to reducing radiological source term inventories.

Steps to achieve the first objective are underway. The decision to recompute the contract was made in February, 2002. The new contract is expected to be in place by January, 2003.

The second objective is supported by four main strategies:

- Increase subcontracting efforts to enable parallel demolition activities.

The master strategy for subcontracting involves four components: 1) acceleration of out year work which is not encumbered by complicated predecessor activities, 2) subcontracting of work scope involving special skills, 3) outsourcing in-house services that are currently occupying facilities which will require decontamination and/or transfer, and 4) selective, short term and/or task-oriented staff augmentation.

- Focus on early source term reduction.

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Source term reduction has and continues to result in substantial risk reduction to workers and the public and has allowed for a considerable reduction in the emergency planning zone. Continued emphasis has been placed on reducing risk by focusing on the major risk contributors, primarily in the tritium facility complex.

- Pursue innovations in clean-up approach and risk reduction.

Identify opportunities and implement new technologies for accelerating work processes without jeopardizing safety performance. Mound is also at the forefront of development of a Long Term Stewardship (LTS) Program and has also been involved with the Science and Technology Program in developing new and improved methods for cleanup and long term monitoring.

- Maximize early transfer of land and property to the MMCIC.

Early transfer of land and property to the MMCIC will reduce DOE's site maintenance costs and will subsequently provide a potential source of revenue to the MMCIC and the local community.

These four strategies support and translate into four implementing initiatives:

- Acceleration of Facility Deactivation and Decommissioning
- Acceleration of Soils Remediation
- Acceleration of Waste Disposal
- Optimization of Project Support to Facilitate Accelerations

| STRATEGIC INITIATIVE | CURRENT PLAN | ACCELERATED PLAN | REVISED STRATEGIES |
|---|---|--|--|
| Accelerate Facility D&D | Complete demolition or decontamination of the six most highly contaminated buildings on site by February 2007. | Complete demolition or transfer of buildings by June 2006. | - Early removal of high concentrations of "holdup" tritium allows accelerated shutdown of tritium emissions reduction facility and also, source term reduction reduces risk to workers and need for higher levels of personnel protective equipment. - Dual shifts and multiple subcontracts on demolition of buildings to speed cleanup. |
| Accelerate Soil Remediation | - Complete remediation and/or close 71 contaminated soil areas (Potential Release Sites (PRS)). - Complete remediation of three key highly contaminated PRSs by June 2006. | Complete key PRSs by August 2005. | - Reduce duration of final remedial design through parallel review cycle for key stakeholders and streamline process requirements and operations. - Accelerate soil characterization and removal plan on the most significant PRSs and commence excavation of PRS-66 by November 2002. |
| Accelerate Waste Disposal | - Waste stored in large quantities and ship later. - Potential health risk to workers and public. | - Waste shipped when generated. - Reduce exposure to workers and public | - Modify rail spur to improve volume and efficiency in rail shipments to disposal sites. - Combine contaminated building debris with contaminated soil to obtain lower disposal cost. |
| Optimization of Project Support to Facilitate Accelerations | Most work performed by in-house employees in single shifts. | - Experienced/trained safety and rad protection personnel available for multiple shifts. | - Reduction in landlord costs. - Staff augmentation for safety and rad protection through subcontracting |

Accomplishment of the two objectives and corresponding four initiatives also respond to the Top-to Bottom Review.

| RESPONSE TO TOP-TO-BOTTOM ISSUES | |
|-----------------------------------|--|
| Issue | MEMP Response |
| Improve DOE's Contract Management | • Mound's contract is being recompeted |

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| | |
|---|---|
| Move to an Accelerated Risk-Based Cleanup Strategy | <ul style="list-style-type: none"> ● Tritium and other radionuclides removal are being fast-tracked ● Uncertainty/Risk Mitigation Plan has been developed, implemented and tracked ● Critical path is routinely assessed for improvement |
| Align Internal Processes to Support Cleanup | <ul style="list-style-type: none"> ● Work contract procedures streamlined with union support ● Annual work plan brings forth outyear work ● Subcontracting allows parallel demolition work |
| Realign DOE-EM Program Scope to Support Cleanup and Closure | <ul style="list-style-type: none"> ● Streamlined DOE oversight aids productivity ● DOE/NE is assessing its mission at Mound ● Implementing new technologies have paid big dividends in cost and schedule |

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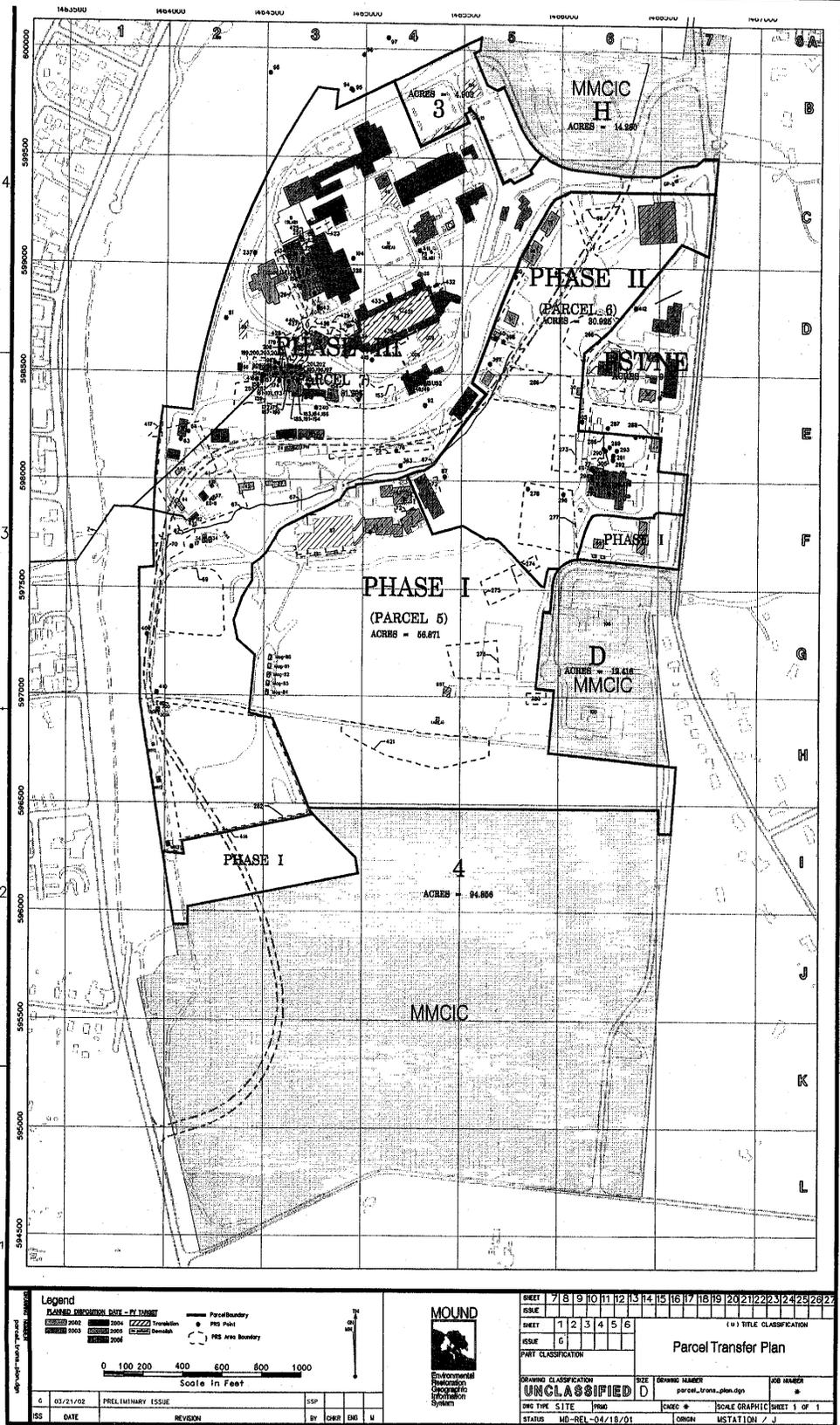


Figure 1

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6. Implementing Initiatives

Integration of Initiatives

To achieve the end state for the Mound site and transfer the property to the MMCIC, a baseline network has been developed. Any acceleration in the exit date must begin with the critical path. Mound's critical path includes the deactivation and demolition of two tritium facilities (SW and R), remediation of release sites related to the tritium facilities and the subsequent documentation for transfer of the site to the MMCIC. Also equally important are the near critical path activities that must be accelerated at a rate equal to or greater than the critical path activities, otherwise those near term activities become critical.

The following logic sequence represents the general prioritization for accelerating the project:

- Execute work on the critical path and near critical activities in the Main Hill Project (PBS-13) and execute work on key radioactively contaminated buildings (PBS-16);
- Execute work on key potential soil release sites (PBS-12);
- Manage and dispose of the additional radiological contaminated waste volumes (PBS-14); and
- Provide additional safety and radiological engineering support for direct work being executed (PBS-17).

The following sections provide further information for each of these initiatives.

6.1 Initiative: Acceleration of Facility Deactivation and Decommissioning

6.1.1 Description

The acceleration of deactivation and demolition of radiological facilities is essential for 2006 closure. The six main radiological facilities are buildings SW, R, T, 38, HH, and WD. Key activities associated with acceleration and risk reduction are:

- Early removal of tritium "hold-up" in the process equipment in Buildings SW, R, and T will reduce tritium exposure to the workers and emissions from the site. It will also allow early shutdown of the Tritium Effluent Reduction Facility (TERF), which is a major safety system to control tritium effluents. Removal of equipment containing process "hold-up" tritium constitutes part of the critical path. To reduce critical path durations, priority must be given to accelerate removal of concentrations of tritium in equipment. This portion of the initiative differs from the original baseline in that priority is given to remove the high concentrations and other highly contaminated equipment and leaving residual contaminated equipment in place to be stabilized later with the building demolition. This change in work sequencing is expected to pay big dividends in cost and schedule.
- The demolition of buildings 38, HH, and WD was originally planned to be performed by the in-house workforce. Subcontracting this work allows parallel demolition activities to proceed safely and improve schedule substantially. Multiple contracts allow demolition to proceed faster and reduce spread of contamination, possibly due to weather or other circumstance. Once the structural shell of a building has been breached through demolition, steady work is necessary to mitigate releases or spread of contamination.

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6.1.2 Key Assumptions

- SW and R buildings will be decontaminated and equipment removed to the extent required to meet the National Emissions Standards for Hazardous Air Pollutants (NESHAP) requirements during demolition
- Remediation of the old cave (entombed hot-cell) will excavate contaminated soil to 4 feet under the footprint of the building. It is uncertain whether contamination extends below 4 feet
- T Building will be decontaminated and transferred to MMCIC after it meets the regulatory requirements, as defined by the USEPA and OEPA
- The Personal Protective Equipment (PPE) requirements will remain at current levels
- Efforts to coordinate exit of current occupants and operations from buildings will not interfere with scheduled demolitions and transitions
- MMCIC changes in utility services will be coordinated and completed on a timely basis
- Unforeseen contamination will create no major problems

6.1.3 Results/Planned Accomplishments

The following accomplishments will be achieved with the accelerated plan:

- Accelerate removal and disposal of in-process nuclear materials (tritium, deuterium, uranium) and the associated components/equipment
- Accelerate deactivation of T Building Areas 2 and 3, so the Tritium Effluent Recovery Facility (TERF) shutdown can be accelerated
- Accelerate remediation of contaminated floor drains, sump pumps and surrounding areas in T Building caused by separation and purification of polonium-210
- Accelerate remediation of entombed hot cell in SW Building
- Accelerate characterization of SW/R Buildings to determine inventory of source terms by radiological and chemical contaminants

In addition to the added stimulus from the CPIX contract, parallel deactivation and demolition of multiple buildings at essentially the same time will be enabled through extensive use of the subcontracting. Critical path and near critical path activities in this initiative will have added emphasis to assure timely completions with the goal of shortening the critical path duration.

Further acceleration opportunities are prioritized as follows:

- 1) Fund subcontracts to demolish non-radiological buildings and remove utility systems as negotiated with the MMCIC
- 2) Lease bigger and more efficient equipment to accomplish demolition activities
- 3) Lease/purchase sanitary treatment modular system to allow site treatment systems to be taken off-line earlier

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Funding support to achieve the above work will support completion of the following milestones:

| | Accelerated Plan | Current Plan |
|--|------------------|--------------|
| • Demolish WD Building and issue report to regulators | Nov. 2004 | Jan. 2005 |
| • Demolish HH Building and issue report to regulators | Oct. 2005 | Feb. 2006 |
| • Demolish SW Building and issue report to regulators | Jan. 2006 | Jan. 2007 |
| • Demolish R Building and issue report to regulators | Jan. 2006 | Jan. 2007 |
| • Demolish Building 38 and issue report to regulators | Mar. 2006 | Sept. 2006 |
| • Deactivate T Building and issue report to regulators | June 2006 | Feb. 2007 |

6.1.4 Key Actions and Responsibilities

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The following table lists the key actions needed for acceleration of facility decontamination and decommissioning. Also included are the responsible organizations, the status of the key action, and the date that the key action is needed.

| Key Actions and Responsibilities for the Acceleration of Decontamination and Decommissioning | | | |
|---|-----------------------|-------------|-----------|
| Action | Responsibility | Status | Date |
| Submit Action Memorandum of SW/R Buildings decontamination and decommissioning to regulators | DOE-OH and Contractor | Complete | Complete |
| Complete bulk source term reduction allowing for reduced risk and increased worker efficiency | Contractor | In progress | Sept 2003 |
| Complete structural demolition of Building 38 (*) | Contractor | In progress | Sept 2003 |
| Continue deactivating critical tritium systems to eliminate residual tritium inventory | DOE-OH and Contractor | In progress | Sept 2003 |
| Complete characterization of soil underneath and around SW and R Buildings | Contractor | In progress | Sept 2004 |
| Accelerate shutdown of TERF | Contractor | In progress | July 2005 |
| Acceleration of D&D through use of subcontracts | Contractor | In progress | Ongoing |
| Complete structural demolition of HH and WD Buildings (*) | Contractor | In progress | Sept 2004 |
| Complete structural demolition of SW and R Buildings (*) | Contractor | In progress | Jun 2005 |
| Assist Mound in obtaining continued DOE-EM Office of Science & Technology funding and technical support for high-risk subprojects | DOE-OH | In progress | Ongoing |

(*) Excludes building soil remediation activities and the On Scene Coordinator Reports issued to Regulators

6.2 Initiative: Acceleration of Soils Remediation

6.2.1 Description

Under this initiative, MEMP will complete assessment of 26 PRSs and remediate 45 PRSs. The focus of this initiative is to accelerate completion of the 26 PRSs that require further assessment and focus on the remediation of PRS-66 which contains buried radiological contaminated equipment and contaminated soil.

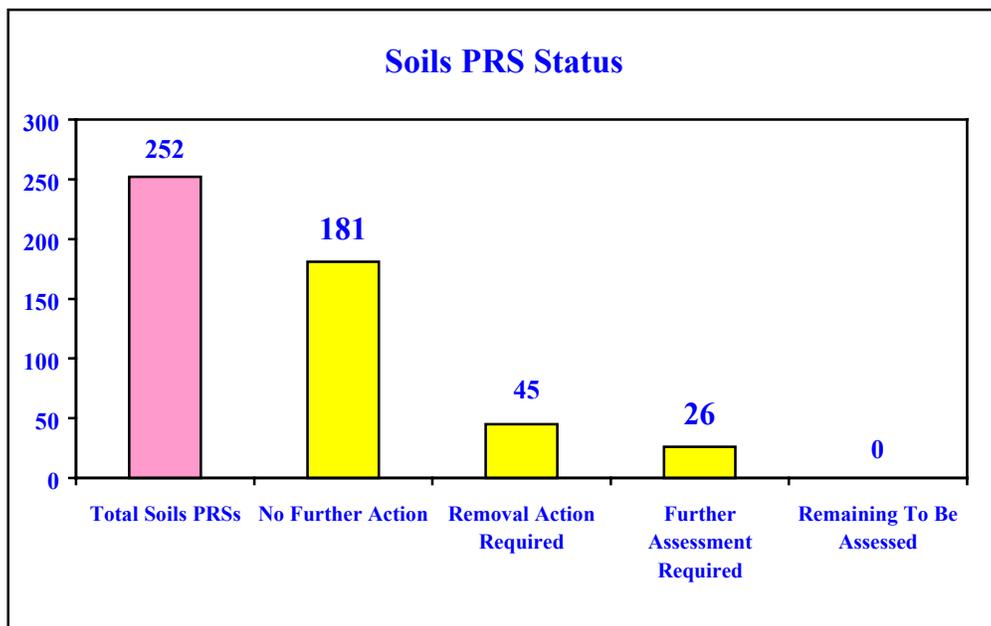
- Early completion of the 26 further assessments is essential for a decision to further remediate or closeout the PRS, i.e., categorized as “No Further Action”. The decision to remediate must be known early on such that mitigating action can be taken. Cost savings in other areas of work are expected to be reinvested into remediation of these PRSs, if any. Shifting priorities to obtain early decisions based on in-depth characterization differs from the original baseline, whereby assumptions on PRS disposition was based on preliminary characterization and process knowledge of these areas.
- Although extensive characterization and data analysis has been completed for PR-66 to estimate the size of the excavation and volume of contaminated soil, accelerated completion of PRS-66 is essential to reduce project cost and schedule risk. The volume is estimated to be significant (1.6 million cubic feet) and the transporting and loading operations in rail cars must be near term, otherwise other site demolition activities could be slowed down. The PRS-66 work is essentially digging a pit in close quarters, and the excavation process could yield higher quantities than expected by either the extent of contamination or pit design. The current approach to PRS-66 remediation has been a drastic modification from the original plan. Regulator and stakeholder input has been crucial in developing a

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plan to remediate this PRS. Involvement by interested parties early on and the acceleration PRS-66 will mitigate impacts to other activities in the outyears of the project.

6.2.2 Key Assumptions

- No Further Assessment PRSs will require remediation
- The Main Hill Seep PRSs will require monitoring only, after suspected source term removal (Bldg SW demolition)
- Thorium drum removal adjacent to OU-1 will not impact the OU-1 landfill or the groundwater remediation system
- SW/R soil contamination does not exceed the 4 foot depth included in the building demolition scope
- Off-site residual risk calculations will conclude that no off-site remediation is required



6.2.3 Results/Planned Accomplishments

The primary accomplishment to be achieved in this initiative is acceleration of the remediation of PRS-66. Other PRS closures will also be enhanced by early demolition of buildings facilitating access to PRS sites.

Funding support to achieve the above work will support completion of the following milestones:

Accelerated Plan

Current Plan

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- Complete remediation of PRS-66, 40, 80 and Draft report to Regulators

Aug. 2005

June 2006

6.2.4 Key Actions and Responsibilities

The following table lists the key actions needed for acceleration of soils remediation. Also included are the responsible organizations, the status of the key action, and the date that the key action is needed.

| Key Actions and Responsibilities for the Acceleration of Soils Remediation | | | |
|---|-----------------------|-------------|----------|
| Action | Responsibility | Status | Date |
| Initiate PRS-66 Removal Action | Contractor | In progress | Nov 2002 |
| Continue to place safety first in the execution of all planned acceleration activities and initiatives | DOE-OH and Contractor | In progress | Ongoing |
| Reduce overall duration of final remedial design through parallel review cycle for key stakeholders | DOE-OH and Contractor | In progress | Ongoing |
| Continue to identify and aggressively mitigate soil uncertainties to lessen impacts on closure | DOE-OH and Contractor | In progress | Ongoing |
| Continue working closely with regulators and stakeholders to streamline process requirements and operations | DOE-OH and EPA | In progress | Ongoing |

6.3 Initiative: Acceleration of Waste Disposal

6.3.1 Description

This initiative treats and disposes of radiological waste streams and eliminates packaging/transportation of off-site waste services.

- During the course of cleanup, Mound generates waste streams that normally would be shipped off-site for treatment and disposal at great expense and adds risk to workers and the public. Similarly, waste streams exist in the previous production facilities that would also have to be sent offsite at great expense. Through the use of new technology innovations, these waste streams can be treated in a manner such that the resulting waste can meet existing waste acceptance criteria and disposal at regular disposal facilities at a lower cost. This change from the original planning has resulted in cost savings to the project and reduces exposure to workers during handling and precludes accident scenarios on the public roadways.
- With the change to transfer land and buildings to the MMCIC in small parcels instead of one or more large parcels at the end of the project, Mound's ability to store low level waste has become limited. Also, as public access to remediation sites become closer with each parcel transfer, protection of public health and the environment becomes paramount. It is essential that Mound ship low level waste quantities as generated. Again, this is a significant change from the plan whereby large quantities of waste were expected to be staged until later time for shipment offsite.

6.3.2 Key Assumptions

- TRU waste is shipped to Savannah River by September 2003*

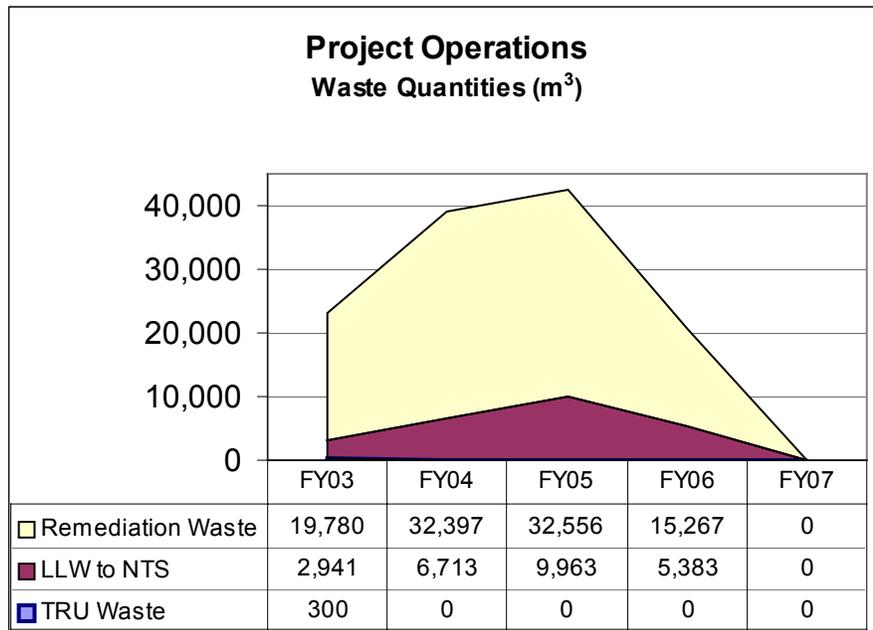
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- Nevada Test Site (NTS) will remain open to receive waste
- Envirocare will remain open to receive waste
- SRS can receive our TRU waste
- No new significant contamination will be identified
- No new TRU waste will be identified

*Mound has entered into a “quid pro quo” agreement with SRS and the Carlsbad Field Office for the shipment of TRU waste to SRS, as SRS sends double the Mound volume to Waste Isolation Pilot Plant (WIPP). Removal of TRU Waste from Mound will result in a major reduction in remaining risk. Mound has resurrected the OHOX Atomic Materials Rail Transfer (ATMX) rail cars and worked with DOT to re-establish the exemption to enable the TRU waste to be shipped to SRS, avoiding major repackaging and certification costs at Mound. SRS will handle Mound’s waste as part of the SRS program at a significantly lower unit cost.

6.3.3 Results/Planned Accomplishments

The Project will ship its Low-Level Waste offsite for disposition or disposal as waste is generated. This involves shipping an estimated 25,000 cubic meters of Low-Level Waste to NTS and an estimated 100,000 cubic meters of Low-Level Waste to commercial disposal facilities. In addition, approximately 300 cubic meters of Transuranic waste will be shipped to SRS. The following chart illustrates remaining volumes to be dispositioned:



6.3.4 Key Actions and Responsibilities

The following table lists the key actions needed for acceleration of waste disposal. Also included are the responsible organizations, the status of the key action, and the date that the key action is needed.

Miamisburg Environmental Management Project Performance Management Plan

| Key Actions and Responsibilities for the Acceleration of Waste Disposal | | | |
|--|---------------------------|-------------|-----------|
| Action | Responsibility | Status | Date |
| Modify rail spur to improve efficiency in rail shipments to disposal sites | Contractor | In progress | Nov 2002 |
| Ship Remaining TRU waste offsite to SRS | DOE-OH,SRS and Contractor | In progress | Sept 2003 |
| Maintain ability to ship waste to NTS and Envirocare | DOE-OH | In progress | Ongoing |
| Establish and maintain blanket contracts with disposal sites | DOE-OH | In progress | Annually |

6.4 Initiative: Optimization of Project Support to Facilitate Accelerations

6.4.1 Description

This initiative cascades down from the other three initiatives. To perform work, especially a number of parallel large work activities on a small site such as Mound, can present significant safety and radiological challenges. The MEMP management team is committed to perform work safely and accomplish the intended work within schedule and cost. Original planning for cleanup of the site had many activities resource loaded with the in-house work force. Subcontracting large work activities accelerates work and reduces the sources term earlier; however, these accelerations must be complemented by optimizing the safety and radiological protection services. This initiative is considered important in that an incident could seriously jeopardize worker protection and overall project.

Mound's history as a laboratory has brought many unusual radionuclides to the site and worker protection has been a key issue for the site. Implementing ISM has resulted in a marked change for the site. The workers perceived risk has been reduced and calls for enhanced safety protection beyond requirements have been minimized. This initiative constitutes a major cost savings while protecting the work force. Worker efficiency has and is improving due to the numerous changes in approach to safety. Planning and decisions are based on risk instead of old paradigm models. Safety first with a sense of urgency motivated by worker incentives is expected to yield significant benefits.

6.4.2 Key Assumptions

- Subcontract expertise will be available when needed
- Work standowns will be of short duration and minimized
- PPE upgrades are minimized

6.4.3 Results/Planned Accomplishments

The Mound safety record has been better than average. However, minor safety and radiological events have increased with work acceleration. Key to sustained acceleration is a strong Integrated Safety Management culture with emphasis on the safety of work planning and oversight. Since this initiative is a support function to the direct programs, discrete work scope accomplishments are not appropriate.

In addition to increased worker efficiencies and reduction in support costs already achieved by modifying site skill mix, reorganization, and downsizing, optimization will further reduce support costs as site acceleration occurs.

6.4.4 Key Actions and Responsibilities

Miamisburg Environmental Management Project Performance Management Plan

The following table lists the key actions needed for acceleration of waste disposal. Also included are the responsible organizations, the status of the key action, and the date that the key action is needed.

| Key Actions and Responsibilities for the Optimization of Project Support Project Support to Facilitate Accelerations | | | |
|---|-----------------------|-------------|----------|
| Action | Responsibility | Status | Date |
| Continue to focus on aggressive reduction of landlord and overhead costs | DOE-OH and Contractor | In progress | Ongoing |
| Move administrative and other functions offsite as appropriate | Contractor | In progress | Ongoing |
| Maximize use of support contracts with small businesses to ensure proper skill mix | Contractor | In progress | Ongoing |
| Continue to develop workforce plans covering lifecycle requirements | DOE-OH and Contractor | In progress | Annually |

7. Benefits, Risk, and Cost Savings

The acceleration of the cleanup project presents a challenge; however, sustained attention to resolve the risk factors and early accomplishment of key benefits will provide the momentum to achieve the goal: cleanup by 2006, or earlier.

7.1 Benefits

The following benefits will be achieved by accomplishing the initiatives:

- Accelerate reduced risk to workers, public, and environment
- Accelerate characterization and remediation of contamination underneath and around the Tritium Facility Complex
- Accelerate removal and Disposition of In-Process Nuclear Materials (Tritium, Deuterium, Uranium)
- Accelerate remediation of Thorium and Polonium Wastes in Production Area 7 Landfill (PRS-66)
- Accelerate Building 38 Demolition and Surrounding Soils
- Accelerate Subcontracts for the Decommissioning and Decontamination of Buildings HH & WD
- Accelerate D&D of Tritium Facility Complex and Transfer T-Building to MMCIC
- Accelerate transfer of land parcels (Phase II and III) to MMCIC to Achieve 100% transfer sooner (296 acres) (Figure 1)
- Maintain compliance with existing FAA milestones

7.2 Barriers to 2006 Closure

Several factors could negatively impact the successful completion of site remediation by the projected end date:

- Savannah River Site (SRS) support for receipt of Mound's Transuranic (TRU) waste
- Cleanup productivity could be impacted by workforce employment concerns and contract transition
- Conducting operations in order to maintain proper balance between environmental emissions and operational controls
- Successful subcontracting for demolition of facilities - Subcontracting has not been a common approach previously used for cleanup work at Mound

Miamisburg Environmental Management Project Performance Management Plan

- Continued cost growth of the legacy pension and retiree medical programs
- Security enhancements that could affect land or facility transfer
- Proposed baseline uncertainty has identified a potential of \$50 million of added scope and schedule growth. This includes probability adjustments; worst case estimates could increase by a factor of two.
- Unexpected Stakeholders' reaction to the cleanup process

7.3 Risks & Mitigation

A project risk analysis was developed based on the known scope descriptions, cost estimates and schedule durations at the individual activity level for direct scope. During this process, planning assumptions were also documented and potential areas of uncertainty were flagged for inclusion in a probabilistic risk analysis to be performed for all direct scope activities.

From this analysis the expected cost growth would be \$50M. This cost is made up of \$30M in scope due to uncertainties becoming reality and \$20M in schedule extension costs (level of effort cost). The schedule would extend to May 2007. Much of the added scope activities could be performed in parallel with critical path activities thus saving all or a significant portion of the schedule extension cost.

By adding funding in FY 2003 and FY 2004 to accelerate work scope with an associated uncertainty, the uncertainty can be mitigated earlier than originally planned, whereby early decisions can be made to minimize impact to milestones and end dates. This would be a significant, added benefit to the overall project. Regulator and stakeholder concerns relative to the timeliness of resolving these uncertainties can be met. Risk reduction dividends can be easily obtained with incremental funding.

There are four major areas of uncertainty that resulted from the risk assessment:

- 1) Higher waste volume from PRS-66;
- 2) Extent of thorium drum removal around the site sanitary landfill (OU-1);
- 3) Extent of soil excavation of the site spoils area; and
- 4) Extent of contaminated soil under the nuclear facilities.

To manage these major risks and other uncertainties, a Risk Management Plan has been developed. The risks included in the plan were initially selected by identifying the critical path activities with the most uncertainty and then expanded to include an evaluation of the critical risk activities identified by a Monte Carlo simulation process. Added to these risks are the added scope activities because of the cost outcomes and the fact that the path forward for each of the top four uncertainties will be dependent upon the consensus of the regulators and community stakeholders. This Risk Mitigation Plan is statused monthly and formal quarterly reviews are conducted to track progress to mitigate or resolve the uncertainties.

To achieve acceleration with the prospect that some of these uncertainties will become real, management will be focusing on three thrusts:

- 1) Each critical risk activity included in the Risk Mitigation Plan must be aggressively pursued.
- 2) Opportunities to implement cost and schedule productivity improvements against each and every activity in the baseline network must be aggressively pursued; and
- 3) Finding innovative cost and schedule improvements.

Examples of actions being currently pursued are:

- Combining contaminated building debris with contaminated soil to obtain soil disposal prices at Envirocare (Soil costs are lower than just debris cost);
- Pursuing alternative remediation approaches for the entombed hot cell in SW Building
- Applying subcontracting of work scope currently identified as in-house work
- Leaving contaminated process equipment in place and removing during building demolition; and

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- Implementing alternate work schedules for critical path and near critical path activities to improve performance.

The scope of the uncertainty challenge is visible and quantitatively defined. Although the risk remains complex and difficult, it is one that is manageable and can be met.

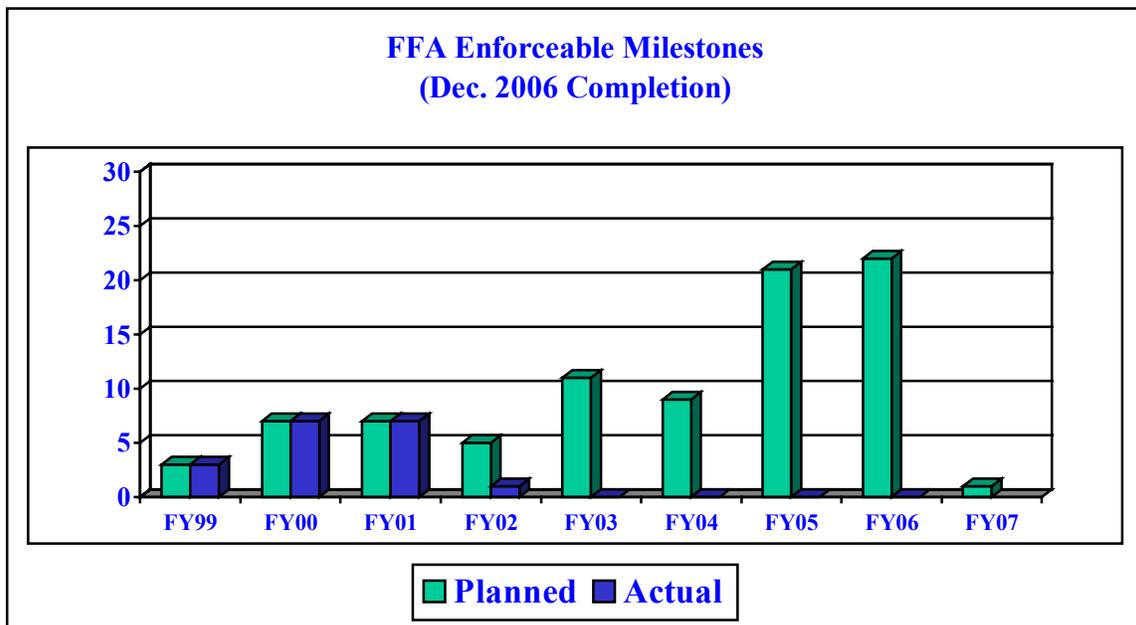
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8. Regulatory Framework

The FFA between DOE, USEPA and OEPA is the cornerstone to expedite the cleanup of the Mound site, and the FFA stipulates financial penalties for failure to meet schedule. The schedule is a set of milestones for each fiscal year, by which the regulators can measure progress annually. Recognizing that baselines change, provisions are provided in the FFA for annual updates to milestones. These updates are negotiated and approved each year as warranted.

The executing framework for the FFA is the Mound 2000 Process. This process delineates DOE and regulator roles and responsibilities and also allows for public participation. As stated earlier in this plan, the Mound 2000 Process has been a valuable management tool to clean up the site, evaluate the residual risk and transfer land and other property to the MMCIC. Central to the framework is the “Core Team” made up of one representative from DOE, USEPA and the OEPA. This group meets monthly at Mound to assess technical data regarding cleanup of potential release sites and buildings. The Core Team makes technical recommendations, ranging from approval of sampling plans to final risk evaluations. Results are provided to the MEMP Federal Manager for impact analysis and decision. Should Core Team recommendations result in new scope, baseline change may be warranted.

Currently, an approved set of enforceable milestones are in place that require the site to be cleaned up by December 2006. The Table below depicts the number of milestones by fiscal year. The milestones represent either the final cleanup of a potential release site or cleanup of a building through demolition or transfer.



The number of enforceable milestones are a number of planning and completion type documents. Although the Mound 2000 Process is a streamlined process, both DOE and the regulators agree that further efficiencies must be planned and implemented to facilitate the review of documents that support direct work.

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Efficiency initiatives have been developed and implemented with the regulators on the following activities:

- Mound 2000 process allows the regulators to work interactively with DOE on “real time” basis to focus on Mound’s numerous, but isolated contamination areas
- Establish an onsite office
- Meetings with MMCIC and DOE on reengineering efforts
- Agreement on streamlining characterization/analyte lists
- Additional OEPA resources
- Parallel reviews of documents
- Shortened cycle times for document reviews
- Additional resources on duplicate sampling to support accelerated soil cleanups

Future efficiency proposals that would further streamline the regulatory process include:

- More onsite presence
- More emphasis on “real time” problem resolution instead of formal letter exchanges

9. Business Strategy

9.1 Business Model

It is fully understood that success in completing the site cleanup on an accelerated schedule requires re-engineering of the business management systems to obtain a synergistic effect from the application of site resources. The Human Resource Management of the site staffing is a critical element in management’s ability to carry out its mission for the DOE. In July 2001, a complete reorganization and reduction of staff was undertaken to obtain the correct skill mix to reflect a downward adjustment in the ratio of salaried to hourly personnel. The involuntary separation yielded benefits with low impact to employee morale and on-going operations. Reorganization and downsizing benefited site operations through:

- Simplifying the organization so that roles and responsibilities are clearer and accountability easy to identify;
- Reducing the number of organizations and direct reports to senior management;
- Reassigning matrix personnel, including labor and craft resources, as direct project reports which provides managers better control over resource utilization;
- Assigning health and safety experts to the projects where health and safety resides while retaining expert central support and equipment; and
- Organizing support scopes of work directly underneath project managers and reducing support organization staff to better focus on accomplishment in the field.

Since accountability for safety, compliance, and efficient progress rests with the project managers, line authority in the new structure flows through the project managers. Oversight responsibilities are implemented by support organizations. This approach is more consistent with the primary guiding principle of Integrated Safety Management. Experience to date shows that self-assessments, employee surveys, and DOE reviews agree that ISM has improved under the revised organizational approach.

9.2 Performance Management Tools

The resource-loaded baseline has been revised to deliver more resources to complete work on time. Remaining scope of work will be executed within the existing infrastructure and will not allow growth in areas not

Miamisburg Environmental Management Project Performance Management Plan

directly responsible for executing project work. The current business model plans to minimize internal staff hiring by:

- Subcontracting scope where possible;
- Increasing contract staff augmentation; and
- Utilizing overtime.

The rationale for minimizing the hiring of direct labor staff is that new employees consume management attention and require training resources that divert energy from the cleanup mission, short term staffing needs do not warrant permanent positions, and downsizing at the conclusion of work is both difficult and costly.

The preferred approach is subcontracting scope in areas other than the Main Hill project to free internal staff for work on the critical path activities.

9.3 Management Systems Description

Mound utilizes a project controls system capable of developing and maintaining the project baseline. The project controls system meets the requirements of DOE Order 413.3 "Program and Project management for the Acquisition of Capital Assets". The objective of the Project Controls System is to:

- Establish and maintain accurate cost, schedule, and technical baselines for the remediation work at the site;
- Assist project managers with efficient planning and execution of work scope;
- Provide an Earned Value Management System meeting industry standards and using a graded approach to order compliance;
- Provide a mechanism for reporting project status to all levels of Contractor and DOE Management;
- Establish a uniform process and standard for performance reporting, variance analysis, and corrective-action documentation; and
- Provide a process for Baseline Change Control.

The baseline is the central component of the project controls system and forms the basis to affect work scope performance changes. It serves as the quantitative expression of the technical scope, schedule, and estimated cost of the work at the site.

The Work Breakdown Structure (WBS) is defined from a logical grouping of tasks to be completed for each project. Defining the WBS entails starting with a very high level scope of work statement that contains the technical requirements. Next, the work is broken into manageable scopes by type of work or geography. The WBS then is typically broken into project phases (i.e. Work Planning, Characterization, Fieldwork, Deactivation, etc.).

The WBS provides the guide to work efforts through the following accomplishments:

- Complete description of work;
- Logical flow and sequencing of work elements;
- Breaks work into sub-elements for cost collection and forecasting;
- Provides the platform for work measurement in terms of earned value;
- Provides work accountability and responsibility;
- Provides the basis for cost rollups and management reporting;
- Integrates work scope, resource requirements, cost, schedule, performing organizational elements; and
- Provides the basis for Baseline Change Control.

9.4 Earned Value Measurement, Analysis and Reporting

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Performance measurement analysis and reporting are critical to the process of assessing a project status, determining when corrective actions are necessary, monitoring their effect, and forecasting schedule and cost impacts. The primary component of measurement and reporting at the Mound site is the monthly Project Performance Reports which provide management with Budgeted Cost of Work Scheduled, Budgeted Cost of Work Performed, Actual Cost of Work Performed, Estimated at Completion, Earned Value Calculation and Cost and Schedule variance analysis.

9.5 Risk Management and Reduction

The existing project baseline also quantifies the potential impact to closure associated with uncertainties that could become reality. For Mound, these uncertainties primarily involve the extent of characterization associated with site soils and underground lines. DOE and the contractor are collaborating on aggressive actions to proactively identify opportunities for risk mitigation. Opportunities to pursue DOE-HQ/EM-50 resources and expertise are being maximized to assist the project in mitigating the effects of these uncertainties on the acceleration of site closure.

9.6 Government Furnished Items/Services

The DOE recognizes that acceleration of work also depends on timely responses of government furnished items and services. The DOE hereby will be providing the following:

| Action | Responsible Organization | Date Required |
|---|--------------------------|----------------|
| Maintain agreements with Savannah River to receive Mound's TRU waste | DOE/MEMP,SRS | Completed |
| Ship remaining TRU waste offsite to SRS | DOE-OH, SRS | September 2003 |
| Disposal contracts for shipping waste to non-DOE disposal sites | DOE/OH | Ongoing |
| Providing Nevada Test Site disposal services | DOE/OH | Ongoing |
| Providing access to and maintaining Nuclear Material Management and Safeguards Systems software | DOE/OH | Ongoing |
| Provide certified shipping containers at a rate and sufficient number for removing nuclear material from the site | DOE/MEMP | June 2003 |
| Obtain agreement with Oak Ridge for the return of CF-252 sealed sources | DOE/MEMP,OR | October 2004 |
| Maintain the "Mound 2000" process with the regulators and negotiate the FFA milestones on a yearly basis | DOE/MEMP | Ongoing |
| Process/respond in 30 days regarding changing to safety authorization basis documents | DOE/MEMP | 30 days |
| Provide outside expertise/teams for application of new technology to cleanup challenges | DOE/MEMP,HQ-EM-50 | Ongoing |

(Note: This Plan has been approved by the Assistant Secretary for Environmental Management, Jessie Roberson, submitted to the Office of Management and Budget, August 2002)



PURPOSE

This letter of intent documents a commitment by the State of Ohio, Ohio Environmental Protection Agency; the U. S. Environmental Protection Agency; and the U. S. Department of Energy (DOE) to accelerate the Mound Facility cleanup.

Additionally, this letter of intent documents how results of the Top-to-Bottom Review, Reengineering Activities and other improvements will be used to:

- ✓ Accelerate cleanup and property transfer,
- ✓ Reduce risk and project schedule uncertainty,
- ✓ Develop integrated planning and funding requests, and
- ✓ Meet commitments under the Mound Federal Facility Agreement (Tri-Party Agreement).

This represents a renewed focus in the Mound Site cleanup, with the objective of accelerating completion and increasing the confidence level in a 2006 or sooner clean-up date. In addition, it establishes a commitment to community reuse. It establishes a bias for action and continuous improvement throughout cleanup.

BACKGROUND

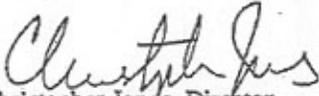
- The Top to Bottom Review (the Review) identified a range of Environmental Management (EM) challenges, noted many areas needing improvement, and issued several calls to action to accelerate cleanup at EM sites.
- The Administration is prepared to increase site-specific budget requests as sites demonstrate a willingness to accelerate the approach to cleanup with the expectation that the accelerations achieved by such near-term increases will lead to significant decreases in later years and substantially less costs to taxpayers overall.
- The constructive working relationships among the regulators and the Department have already resulted in changes in priorities, strategies, work practices and commitments, and have created a framework for dealing with other issues.
- In addition, DOE is actively engaged in fundamentally transforming how it conducts its business through contract reprourement at the Mound.
- The Federal Facility Agreement was originally envisioned and has evolved as a living document, adaptable to improvement as experience and new information are obtained.
- Several specific initiatives being implemented focus on accelerated cleanup and demonstrate a transformational change to the way business is being conducted:
 - ✓ Focus on the Activities that Contribute Directly to Closure
 - ✓ Lower overhead costs to allow for more direct cleanup
 - ✓ Energize the Workforce Through Strong Effective Leadership
 - ✓ Provide Open Regular Communication Among All Parties Involved
 - ✓ Foster a Team Environment Based on Mutual Respect and Trust with Clear Roles and Responsibilities

UNDERSTANDINGS

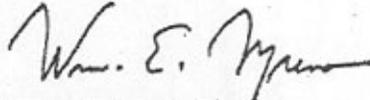
The following statements document the commitments and progress that have been made to date:

1. All parties share a desire to fundamentally transform the project and a vision to accelerate risk reduction and cleanup of the Mound Site prior to December 2006, possibly as soon as 2005. Additionally, accelerated cleanup will be accomplished in a manner that is safe, protective of human health and the environment, and compliant with all applicable State and Federal environmental laws and standards.
2. DOE and its contractors bear the greatest responsibility to transform their business practices to accelerate cleanup. DOE and its contractors agree to take all necessary steps to accelerate risk reduction and to apply as large a percentage as possible of the Mound Site's budget to accelerated cleanup as a continuing and ongoing process.
3. All parties will be accountable for meeting their commitments. To this end, the parties agree that accelerated cleanup and meeting our commitments are made more attainable with sufficient, stable, and predictable funding; good regulatory relationships; broad stakeholder support; and incorporating sound risk management practices.
4. All parties agree to consider *greatest risk first* at the Mound Site as a significant principle in setting priorities and cleanup strategies, recognizing there are other factors that need to be considered including balancing risk to workers, the public, and the environment. In this regard, all parties agree to aggressively evaluate and implement, where appropriate, the targets of opportunity for accelerated risk reduction as well as actions identified which will expedite transition.
5. The Mound Site is in the process of planning for accelerated cleanup that meets the criteria for potential access to the Cleanup Reform Appropriation.
6. The parties continue to value the importance of enforceable commitments to sustain progress and agree that as improvements are further demonstrated, that further changes to enforceable agreements will be proposed under its existing change control processes.
7. The parties agree that more detailed plans and action assignments will be needed to implement accelerated cleanup. As a first step to guide those efforts, DOE will compete the Mound contract. The contract will include a set of specific goals for physical progress by 2005 that will represent a major acceleration from current plans.
8. The Regulators will be consulted on development of the accelerated baseline schedule, assumptions and documentation as developed by DOE and contractor.
9. DOE further commits to continue long-term stewardship efforts with the Regulators and all stakeholders, to achieve successful closure of the Mound site. All parties agree that an effective DOE funded long-term stewardship program is a necessary component of a successful site closure. Additionally the parties agree such a program must be established and fully implemented prior to site closure. Initial details of this program are included in DOE's documents: draft Comprehensive Stewardship Plan and the Master Plan for Public Use.
10. DOE considers this *letter of intent*, together with achievement of the items delineated above, to meet the objectives called for in the President's fiscal year 2003 budget request for sites to reach new agreements with State and Federal regulators to help accelerate and improve cleanup performance.
11. DOE will conduct routine meetings, to assess the status and ensure progress of DOE support to accelerated cleanup at the Mound Site. Summary evaluations will be provided to the Assistant Secretary.
12. The principals will continue to meet twice a year to provide the leadership needed to ensure progress, solve problems, and promote new initiatives, including long term stewardship.
13. Nothing in this letter of intent modifies any of the rights, authorities, or obligations currently stated in or incorporated by reference into, the Federal Facilities Agreement or any other enforceable agreement. Further, at this time the Parties do not anticipate modifying the existing Federal Facilities Agreement in order to accelerate the Mound facility cleanup.

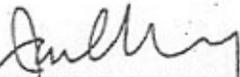
We, the undersigned, are committed to work together to implement these work plan agreements and to seek additional opportunities to accelerate and improve cleanup.



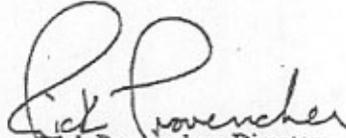
Christopher Jones, Director
Ohio Environmental Protection Agency



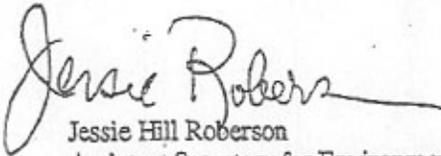
William E. Muno, Director
Superfund Division
U. S. Environmental Protection Agency, Region 5



Jack R. Craig, Acting Manager
Ohio Field Office
U. S. Department of Energy



Rick Provencher, Director
Miamisburg Environmental Management Project
U. S. Department of Energy



Jessie Hill Roberson
Assistant Secretary for Environmental Management
U. S. Department of Energy



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

July 22, 2002

Ms. Jessie Hill Roberson
Assistant Secretary of Environmental Management
U.S. Department of Energy
1000 Independence Avenue S.W.
Washington, DC 20585

Dear Ms. Roberson:

I am writing to you to reiterate Ohio EPA's endorsement of the concepts of accelerated cleanup at the Mound site in Miamisburg, Ohio, as outlined in the Letter of Intent jointly signed by Ohio EPA, U.S. DOE and U.S. EPA. Ohio EPA is encouraged by U.S. DOE's development of a Performance Management Plan (PMP), and hopes that it will aid U.S. DOE in achieving the goals of a more efficient, safer and protective cleanup of the Mound site. The focus of our agency has been to ensure a cleanup that is safe, protective of human health and the environment, and compliant with all applicable state and federal environmental laws, as described in our enforceable agreements. We recognize the value of accelerated cleanup, so long as the above conditions are not compromised.

As we support the acceleration of cleanup at Mound, we must reiterate the need for a credible and sustainable long term stewardship program nationally and at Mound. Successful closure cannot be achieved without such a stewardship program. The long-term stewardship program needs to be developed and in-place well before closure is achieved to ensure a smooth transition. Inclusion of the development of the site specific stewardship program within the PMP seems most appropriate.

As always, Ohio EPA continues to work closely with the U.S. DOE site personnel, U.S. EPA and local stakeholders to implement a safe, protective and efficient cleanup of the Mound site. We look forward to working with you and your staff to address the many challenges facing us over the coming years.

If you have any questions, please contact me at (614) 644-2782.

Sincerely,

Christopher Jones
Director

cc: Tim Fischer, U.S. EPA
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

JUL 22 2002

Ms. Jesse Hill Roberson
 Assistant Secretary for Environmental Management
 U.S. Department of Energy
 1000 Independence Avenue S.W.
 Washington, D.C. 20585

REPLY TO THE ATTENTION OF: SRF-5J

Subject: Support for the Objectives of the Performance Management Plan for the Closure of the Mound Site

Dear Ms. Roberson,

I am writing to you to reiterate the U.S. Environmental Protection Agency's (EPA) endorsement of the concepts of accelerated cleanup at the Mound site, as outlined in the Letter of Intent jointly signed by the Ohio Environmental Protection Agency (OEPA), the U.S. Department of Energy (DOE) and EPA.

EPA is encouraged by DOE's development of a Performance Management Plan (PMP) and hopes that it will aid DOE in achieving the goals of a more efficient, safer and protective cleanup of the Mound site. We agree with the broad objectives and goals of the PMP. We look forward to further discussions with DOE and OEPA regarding the detailed implementation of the initiatives outlined in the PMP. As we have cooperated well together in the past, we will continue to work with DOE and OEPA to aggressively evaluate and implement, where appropriate, those initiatives that will accelerate risk reduction and site closure.

The focus of our agency has been to ensure a cleanup that is safe, protective of human health and the environment, and compliant with all applicable state and federal environmental laws, as described in our enforceable agreements. We recognize the value of accelerated cleanup, so long as the above conditions are not compromised.

As we support the acceleration of cleanup at Mound, we must reiterate the need for a credible and sustainable long-term stewardship program nationally and at Mound. Successful closure can not be achieved without such a stewardship program. The long-term stewardship program needs to be developed and implemented well before closure is achieved to ensure a smooth transition. Inclusion of the development of the site-specific stewardship program within the PMP seems most appropriate.

As always, EPA continues to work closely with the DOE site personnel, OEPA and local stakeholders to implement a safe, protective and efficient cleanup of the Mound site. We look forward to working with you and your staff to address the many challenges facing us over the coming years.

Sincerely,

William E. Muno
 Director
 Superfund Division

cc: Tim Fischer, US EPA (SRF-5J)
Brian Nickel, Ohio EPA - SWDO
Graham Mitchell, Ohio EPA - SWDO
Rick Provencher, US DOE - MEMP

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