

## **Regulatory Agency Meeting to Discuss Work Scope for the WAG 7 Phase 3 Remedial Design of an Evapotranspiration Cover on the Subsurface Disposal Area at the Radioactive Waste Management Complex, Idaho National Laboratory Site**

March 28, 2017

Idaho Department of Environmental Quality (DEQ)  
Conference Room B  
1410 N. Hilton  
Boise, Idaho

**Attendees:** Daryl Koch (DEQ); Charles Sullivan (Fluor Idaho); Brandt Meagher (Fluor Idaho); Gundar Peterson (Daniel B. Stephens & Associates); Donna Nicklaus (Fluor Idaho); Dennis Faulk (USEPA Region 10); Dave Einan (USEPA Region 10); Rich Abitz (Fluor Idaho); Marc Jewett (Fluor Idaho); Elamin Yousif (DOE-ID); Nolan Jensen (DOE-ID); Mark Clough (DEQ); Ted Livieratos (DEQ); Brady Johnson (DEQ).

### Introductions

DEQ welcomed the attendees, and participants introduced themselves to other attendees. Fluor Idaho distributed the meeting agenda (Attachment I), a proposed list of drawings (Attachment II) and outline for the design report (Attachment III), an ARAR table (Attachment IV), and several maps (turned over to DEQ). USEPA Region 10 noted that Emerald Laija (USEPA Region 10) would not be attending the meeting because she was being reassigned to EPA headquarters. However, USEPA Region 10 requested that all formal communication transmittals with USEPA Region 10 be sent to Emerald Laija and copy Dennis Faulk until the end of May.

### Remedial Design versus Remedial Action

Fluor Idaho presented a sketch model (Attachment V) to illustrate their proposal of where the work scope for remedial design of the evapotranspiration (ET) cover falls in relationship to future remedial action work scope and future DOE-ID plans for the infrastructure surrounding the subsurface disposal area (SDA). The present contract between DOE-ID and Fluor Idaho is a five year contract with no option for extension, and Fluor Idaho CERCLA work scope is restricted to remedial design of the ET cover for the SDA. That is, there is no work scope for remedial action planning and construction of the ET cover in the present contract between DOE-ID and Fluor Idaho.

The sketch model distinguishes between Remedial Design and Remedial Action work scope centered on the 'what' versus the 'how'. Fluor Idaho suggested that the remedial design for the ET cover will capture what must be done to achieve the performance infiltration goal of less than 1 cm/yr, and the future remedial action documents will describe how it will be done. For example, the O&M Plan, Construction QA Plan, and H&S Plan must be mentioned in the remedial design to describe what components are necessary to ensure the ET cover is constructed and maintained to meet the performance goal of less than 1 cm/yr, but the production of these documents to describe how the construction and maintenance will achieve and maintain the performance goal will become part of the submittal registry

for the future construction contractor who executes the remedial action work plan. DOE-ID and Fluor Idaho noted that they were aligned on the philosophy of science and engineering driving the design, and their working assumption is that existing infrastructure will not be a driver for the ET cover design.

Remedial Design Decisions

In agreement with Section 1.3 of the OU 7-13/14 Phase 3 Remedial Design Work Plan (DOE/ID-11482, Rev.0) (herein after RDWP), DOE-ID, DEQ and USEPA Region 10 can manage changes to the scope in the RDWP through working meetings and informal processes. Agreed to changes would be documented in meeting minutes or other written form and placed in the project file. This record of the meeting minutes from March 28, 2017 will be placed in the CERCLA project file.

The following changes were discussed and agreed to between DOE-ID, DEQ and USEPA Region 10:

- 1) The cost estimate in the ROD will be updated to realign the costs with current assumptions on the remedial design for the evapotranspiration cover.
- 2) The last sentence of the first paragraph on page 34 of the RDWP will be changed to: “The first iteration of the D&D plan will be submitted with the 90% pre-final design to EPA and DEQ for review.”
- 3) The first iteration of the D&D Plan should point to all bullets on page 36 of the RDWP to acknowledge those decisions that are being pushed out until DOE-ID awards a construction contract to build the evapotranspiration cover.
- 4) The first iteration of the D&D Plan will have a rough sequence schedule to show relative timing of the D&D and construction of the evapotranspiration cover.
- 5) The second to last bullet on page 50 of the RDWP will be changed to: “A decision on how to monitor percolation and what instruments are required, such as pan lysimeters, will be submitted with the 30% design to EPA and DEQ for review.”
- 6) The design subcontractor, Daniel B. Stephens & Associates (DBS&A), will review the Pad A Focused Feasibility Study and determine the best approach for stabilizing Pad A prior to construction of the evapotranspiration cover.

**Remedial Design Deliverables to DEQ and USEPA Region 10 in FY17, FY18 and FY19**

Pad A Focused Feasibility Study (final)	April 2017
Borrow Source Study Report (draft)	June 2017
Long-Term Monitoring Network Design Study (draft)	September 2017
Technical & Functional Requirements Document (draft)	October 2017
30% Design Package (draft)	February 2018
Vadose Zone Vapor Rebound Study Test Plan (draft)	April 2018
90% Design Package	November 2018
100% Design Package	July 2019