

I-12 Post Decision Document Requirements Operating Instructions

The following delineates the Federal Facility Agreement Operating Instruction for the documentation and approval of changes to the monitoring and stewardship requirements approved in Oak Ridge Reservation *Decision Documents (Action Memorandum or Record of Decision, Removal Action Reports, Remedial Action Reports (RAR),* and in some *Remedial Action Work Plans* (only in the few cases where this document was the last document generated for an Operable Unit).

1. A listing of all monitoring and stewardship requirements will be consolidated annually in the RER, section 2.1.
2. Until proposed requirement changes have been approved by the three FFA Project Managers, the currently approved requirements, identified in the RER, will be followed.
3. Changes to these requirements shall be approved by the FFA Project Managers following the process below:
 - a. Upon the identification by the DOE of the need to propose changes to the approved requirements, technical justification will be prepared and presented to the appropriate TDEC and EPA staff. Concerns and issues will be identified and addressed. During this period, the three parties' representatives will make an initial determination on whether the change(s) would result in a change to the intent of the decision document and/or the specific requirement(s) identified in post decision documents.
 - b. If DOE chooses to proceed with the request, a formal letter will be generated and sent to the TDEC and EPA FFA Project Managers. The letter will clearly identify the change requested, contain technical justification, and identify whether or not it would be necessary to reopen and modify the decision document and/or the appropriate approved FFA documents.
 - c. If the change is approved by the three parties, the change will be implemented, documented in the RER requirements list, and if necessary a schedule/process will be agreed to for the modification of the appropriate document(s)
 - d. If approved, the formal request letter and the two approval letters will be filed in the appropriate Administrative Record post decision file.
4. The review, DOE certification, and approval of the annual RER will be conducted by the three FFA Project Managers. Every fifth year, the RER will be submitted to satisfy the CERCLA 5-year review requirements for the ORR.

The annual Remediation Effectiveness Report is to provide monitoring and stewardship activity reports for remediation activities that are completed and the PCCR and/or RAR (primary documents containing necessary post-remediation monitoring) have been approved. Every fifth year the RER document will be expanded to reflect the effectiveness of the remediation completed/on-going and will satisfy the requirements of the CERCLA 5-Year Report.