

Department of Energy

Washington, DC 20585

March 25, 2005

MEMORANDUM FOR ROBERT F. WARTHER
MANAGER, OHIO FIELD OFFICE

FROM: PAUL M. GOLAN *Paul M. Golan*
PRINCIPAL DEPUTY ASSISTANT SECRETARY
OFFICE OF ENVIRONMENTAL MANAGEMENT

MICHAEL W. OWEN *Michael W. Owen*
DIRECTOR
OFFICE OF LEGACY MANAGEMENT

SUBJECT: Approval of Mound and Fernald Site Transition Plans

The purpose of this memorandum is to approve the attached Site Transition Plans for Fernald and Mound, dated February 2005 and March 2005, respectively.

As articulated in the Terms and Conditions for Site Transition, any updates to these plans should be identified and submitted with each site's quarterly report.

Congratulations on your and your staffs' hard work to bring this effort to fruition.

Attachment

cc: M. Gilbertson, EM-20
R. Goldsmith, EM-23
D. Geiser, LM-40
J. Kang, LM-40
N. Shahadi, EM-23





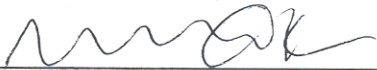
Transition Plan for the Fernald Closure Project

February 2005



Signatories

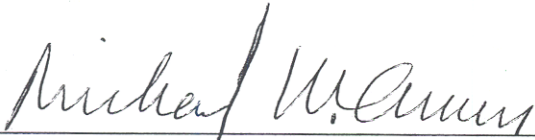
The following signatories on behalf of their respective organizations approve this plan.



Paul M. Golan
Principal Deputy Assistant Secretary
Office of Environmental Management

3/29/05

Date



Michael W. Owen
Director
Office of Legacy Management

3/25/05

Date

**Office of Legacy Management and
Office of Environmental Management**

**Transition Plan for the
Fernald Closure Project**

February 2005

Developed by an integrated transition planning team comprised of representatives from LM-40, LM-50, EM (Ohio and Fernald Closure Project), the LM contractor (S.M. Stoller under DOE Contract No. DE-AC01-02GJ79491), and the Fernald site contractor (Fluor Fernald, Inc. DE-AC24-01OH20115).

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Acronyms

ACA	Amended Consent Agreement
ACD	Amended Consent Decree
AR	Administrative Record
AWWT	Advanced Wastewater Treatment
CAWWT	Converted Advanced Wastewater Treatment
CBC	[DOE-EM] Consolidated Business Center
CD-4	Critical Decision-4
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CE/TP	Comprehensive Exit/Transition Plan
D&D	Decontamination and Dismantlement
DOE	U.S. Department of Energy
EEOICPA	Energy Employees Occupational Illness Compensation Program Act
EM	[DOE] Office of Environmental Management
EPA	U.S. Environmental Protection Agency
ESAAB	Energy Systems Acquisition Advisory Board
FCP	Fernald Closure Project
FFI	Fluor Fernald, Inc.
FIMS	Facilities Information Management System
FTE	Full-Time Equivalent
FY	fiscal year
IC	institutional control
IRMTP	Information and Records Management Transition Plan
LM	[DOE] Office of Legacy Management
LMICP	Legacy Management and Institutional Controls Plan
LSO	Local Stakeholder Organization
LTS&M	long-term surveillance and maintenance
MOA	Memorandum of Agreement
NARA	National Archives and Records Administration
NRD	National Resource Damage
OEPA	Ohio Environmental Protection Agency
OH	[DOE] Ohio Field Office
O&M	Operations and Maintenance
OSDF	On-Site Disposal Facility
OU	Operable Unit
PCB	Polychlorinated Biphenyl's
PCOR	Preliminary Closeout Reports
RA	Remedial Action
RAR	Remedial Action Report
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
STF	Site Transition Framework
STP	Site Transition Plan

Executive Summary

The U.S. Department of Energy (DOE) Office of Legacy Management (LM) and Office of Environmental Management (EM) have initiated the transition of the Fernald Closure Project (FCP) at Fernald, Ohio, into LM for legacy management and for certain legacy worker and contract liabilities. The Fernald site, near Fernald, Ohio, is on an accelerated cleanup schedule with an anticipated completion in fiscal year (FY) 2006. Transition and project closeout of the FCP is categorized into three phases: (1) Physical Completion, (2) Regulatory Completion, and (3) Contractual/Financial Completion. The Site Transition Plan (STP) will serve as the transition/closeout planning document that integrates activities from each of these project closeout phases by identifying organizational and financial responsibilities necessary for attaining FCP closeout and obtaining Critical Decision-4 (CD-4) project closeout approval. The STP is an internal DOE management tool and is not an enforceable regulatory document. It has been developed in accordance with the Site Transition Framework (STF) guidance that identifies transition requirements in 10 functional areas. The STF is used to verify that all appropriate steps have been or will be taken to close out the site and to identify actions by both the EM and LM organizations to transfer the site to LM.

The most significant programmatic issue for transition of the FCP relates to the projected date of turnover to LM. The contractor Declaration of Physical Completion (March 31, 2006) is defined by the FCP closure contract (DE-AC24-01OH20115) and represents construction of all short and long-term response actions necessary to mitigate environmental and human health risks. For FCP, these tasks include completion of physical work associated with Operable Unit (OU) 1 through OU4, including restoration of the site in accordance with the Natural Resource Restoration Plan and establishment/installation of all infrastructure necessary for the long-term surveillance and maintenance (LTS&M) of the remedies. Upon EM acceptance of the contractor's Physical Completion declaration, LM will assume operational responsibility for the FCP; however, EM will maintain financial responsibility until Regulatory Completion and final CD-4 package approval is obtained. The FCP contract allows for a 14-day DOE review of the declaration for reasonableness; therefore, the planning date of April 19, 2006, is assumed for operational turnover to LM. The final "Terms and Conditions" between EM-1 and LM-1 dated February 15, 2005, state that the budget responsibility for a site remains with EM until the beginning of the fiscal year following cleanup completion. It should be noted that the Terms and Conditions were developed well after negotiation of the FCP closure contract. As a result, the definition of terms for physical completion by 2006 in the closure contract and cleanup completion in the EM/LM transition guidance is not equivalent. Fernald will be utilizing a site-specific strategy to resolve the discrepancy, however, it is recommended that all future closure contracts include comprehensive and integrated requirements for transition from EM to LM to prevent reoccurrence. Since (a) regulatory completion is required to certify that environmental actions have met all requirements and no additional active management is needed with the exception of long-term response actions in OU5 and (b) FCP regulatory completion is not anticipated until mid FY 2007, LM will not become responsible for the site financial requirements until the beginning of FY 2008. LM will assume responsibility for ongoing operation of the aquifer long-term response action at the time of transfer; therefore, LM will be responsible for Regulatory Completion of OU5 once the aquifer restoration has been completed (estimated in the year 2025). Contractual/Financial closeout involved the completion of remaining administrative matters. This includes, but is not limited to, pending and ongoing legal actions, claims, warranties made as part of the contract, and a review of obligated

funds/payments made to the contractor/and pending invoices. Contractual/financial closeout will be completed by the EM Consolidated Business Center (CBC) following acceptance of the declaration of physical completion.

Major milestones for site transition that will be under configuration control with EM-1 and LM-1 are listed in Table 1. A timeline of overall milestones and activities that will occur during transition is included in Figure 1.

Table 1. Fernald Major Milestones

Milestone	Transition Area (noted by section number)	Completion Date
1. EM settles the National Resource Damage suit.	2.2	July 1, 2005
2. EM completes the Comprehensive Legacy Management and Institutional Controls Plan (LMICP), which also serves as the LM FCP LTS&M Plan.	2.3	March 31, 2006
3. EM with LM support completes the Program Budget Document for FY 2008.	2.6	April 15, 2006
4. EM completes transfer of records, both electronic and paper, to LM.	2.7	April 19, 2006
5. LM assumes operational responsibility and completes procedures, contracts, and/or agreements and trains resources for monitoring and maintenance of the site in accordance with the LMICP.	2.3	April 19, 2006
6. EM submits Final CD-4 Package for Energy Systems Acquisition Advisory Board (ESAAB) Approval.	2.10	June 1, 2007
7. LM is prepared to accept the remaining portions of the existing regulatory agreements for LMICP and OU5.	2.5	September 30, 2007
8. EM satisfies the Amended Consent Agreement (ACA) for OU1 through OU4.	2.5	September 30, 2007
9. Responsibility for pensions and benefits transferred to LM.	2.10	October 1, 2007
10. LM accepts active real property records/transfer.	2.4	October 1, 2007

The primary goal of the FCP transition is the efficient closeout of EM site activities and the transfer of all long-term DOE responsibilities from EM to LM in a timely manner, with no disruption of services and no negative effects on the ongoing closure mission. To ensure transition progresses on schedule, it will be managed as a project with tracking of specific actions and risks within each functional transition area. EM and LM will use this transition plan, as well as the Fernald Transition Matrix, to capture key activities and track progress. Quarterly progress reports will be provided to EM-1 and LM-1 beginning April 2005. The STP will be updated if progress against the requirements become such that milestones or actions identified are no longer valid.

Fernald Transition Documentation Timeline

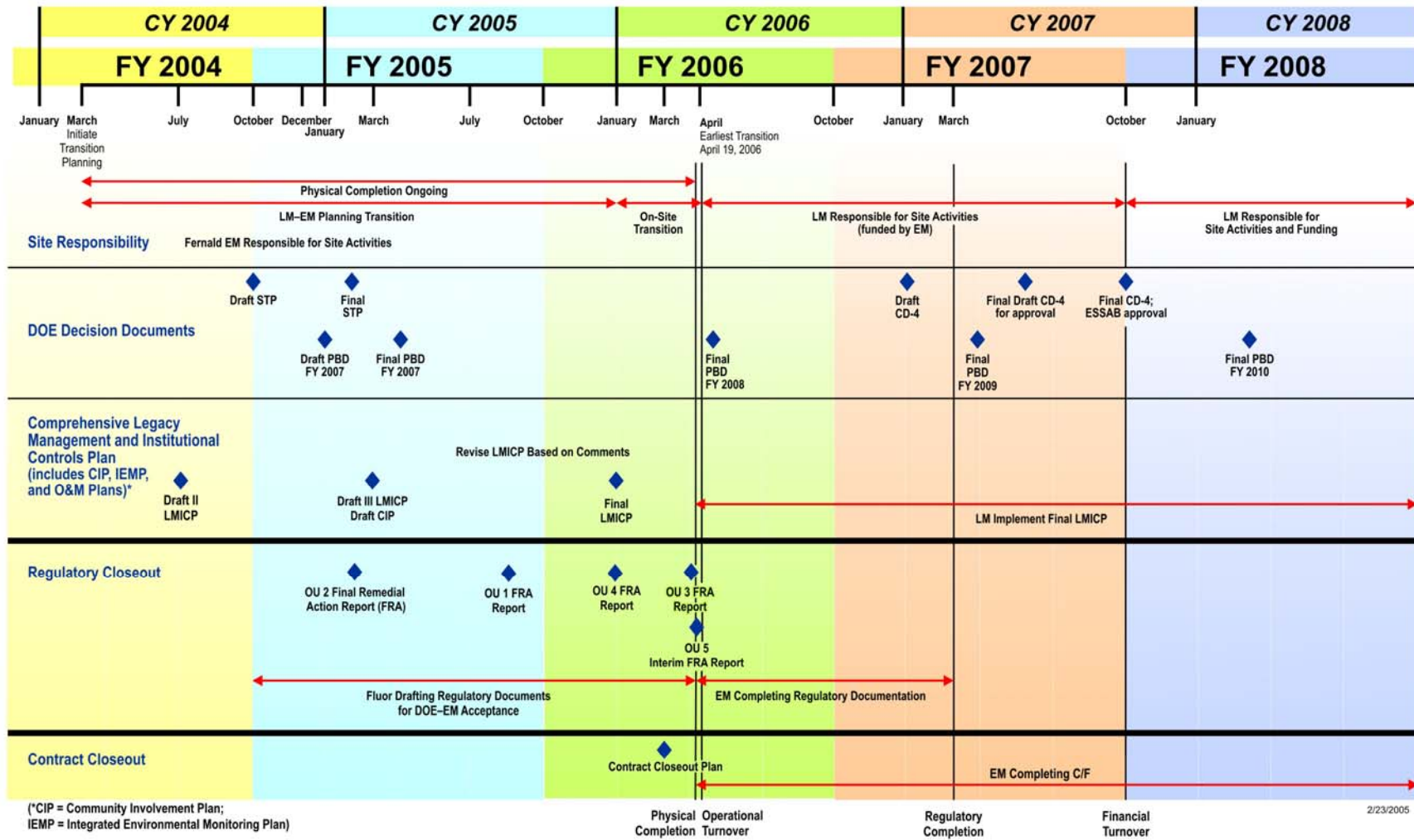


Figure 1. Fernald Transition Documentation Timeline

Key uncertainties associated with the transition process are summarized in Table 2. A qualitative measure of the potential inability to achieve overall project objectives within defined cost, schedule, and technical constraints has been included. The measure is indicative of both the probability/likelihood and the consequences/impacts of failing to achieve the desired outcome. A designation of high represents that if the condition occurs, a major disruption is likely; medium represents some disruption; and low represents minimum disruption. Risk planning efforts to ensure risks are accepted, avoided, or mitigated are further described in Section 1.5 of this plan.

Table 2. Programmatic Risks and Risk-Handling Strategy

Risk Condition	Consequence	Risk-Handling Strategy
<p>A disposition path for the OU4 (Silos) Waste has not been identified.</p>	<p>HIGH: Physical Completion cannot occur without removal of the silo waste from the site. If a disposal contract is not in place by the date at which FFI declares readiness on the silo's project (currently projected for March 31, 2005), the ability for FFI to declare physical completion by March 31, 2006, is in jeopardy.</p>	<p>MITIGATION PLAN:</p> <ol style="list-style-type: none"> 1. LM subcontracts will be written to begin as early as April 19, 2006, but with flexibility in the start date. 2. Assume operational transfer in FY 2006 but financial transfer in FY 2008 due to Regulatory Completion activities that will extend into FY 2007. This will also allow a contingency period for any slippage in the declaration of physical completion. 3. EM (DOE-OH) and FFI partial risk mitigation/procurement strategy is in place to remove the waste (either temporarily or permanently) to an off site permitted facility.
<p>Potential post-closure financial responsibilities resulting from the Natural Resource Damage (NRD) Settlement are unknown.</p>	<p>HIGH: The terms of the NRD Settlement need to be defined by the February 2005 time frame to support the budget formulation process for FY 2007 or there will be inadequate funds to implement the Settlement. Delay in finalizing the NRD Settlement beyond July 1, 2005, also impacts the ability of FFI to implement the terms of the Settlement by the March 31, 2006, Declaration of Physical Completion and to finalize the LMICP.</p>	<p>MITIGATION PLAN:</p> <ol style="list-style-type: none"> 1. EM (DOE Ohio Field Office [DOE-OH]) will negotiate terms of the draft Settlement by February 1, 2005. (COMPLETE) 2. EM (DOE-OH), in consultation with LM, will include a planning assumption (based on current negotiations) for the settlement costs in the FY 2007 budget formulation process. 3. EM (DOE-OH) will finalize the Settlement by July 1, 2005, to allow for the following successor activities in the exit schedule: <ul style="list-style-type: none"> • Implement terms of the Settlement via a Record of Decision (ROD) modification by October 1, 2005. • Define requirements for the Statement of Work in support of LM procurement of a Site Management contractor by July 30, 2005. • Provide a decision by August 1, 2005 regarding whether the trailers/warehouse will remain, whether it's on site/off site, and determine the occupants. • Revise Final LMICP to include Settlement terms by January 31, 2006.

Table 2 (continued). Programmatic Risks and Risk-Handling Strategy

Risk Condition	Consequence	Risk-Handling Strategy
The ability of LM to complete procedures, negotiate contracts and/or agreements, and train resources for monitoring and maintenance of the site by April 19, 2006, is uncertain.	HIGH: The date at which procurement activities and resource training activities need to begin to ensure timely completion will be before all long-term monitoring requirements have been fully established by EM.	MITIGATION PLAN: 1. LM will begin procurement activities by July 30, 2005. EM (DOE-OH and FFI) will provide the most current information on the On-Site Disposal Facility, Converted Advanced Wastewater Treatment, NRD Settlement, etc., to support development of the Statement of Work.
Active real property records do not meet DOE criteria for transfer.	HIGH: EM (DOE-OH) has not had a certified real estate specialist on staff. Records consist of varying individual filing systems used for several years, with a varying degree of quality. If active real property records do not meet DOE criteria for transfer, the CD-4 package will be delayed, thereby delaying LM acceptance of the site.	MITIGATION PLAN: 1. Joint Richland (currently providing Real Estate support to DOE-OH) and LM assessment of OH records beginning in FY 2004 to identify actions to be completed for real property records to meet DOE criteria for transfer. (COMPLETE) 2. Quarterly follow-up assessments to be conducted in FY 2005 to monitor progress and perform interim acceptance of completed portions of the records.
The availability of a national contract for pensions and benefits management at physical completion is uncertain.	MEDIUM: The FFI contract allows for DOE direction regarding continued management of the pensions and benefits; however, costs for continued management are not currently identified in the FY 2007 budget.	MITIGATION PLAN: 1. FFI to identify options, the date at which decisions are needed to ensure continued management, and resource needs for each option in February 2005 to support FY 2007 budget formulation. 2. EM (DOE-OH) will review the alternatives and make a decision on the path forward by April 1, 2005.
As a result of the downsizing of EM (DOE-OH) offices, availability of adequate resources to support closure activities is in question,	MEDIUM: Functions of the Consolidated Business Center (CBC) for closure activities are currently being defined to minimize impacts to closure sites.	MITIGATION PLAN: 1. EM (DOE-OH) will complete a functional analysis and gap analysis. (COMPLETE) 2. The EM-CBC Director will concur on the FCP STP to serve as a Memorandum of Agreement/Understanding of closure services to be provided. (COMPLETE)
The ability for EM to achieve Regulatory Completion in FY 2007 is uncertain.	MEDIUM: Because the OU5 remedy will continue as a long-term response action, it is unclear how EM will close the Amended Consent Agreement and Amended Consent Decree in support of Regulatory Completion during FY 2007.	MITIGATION PLAN: 1. EM-CBC will be staffed by closure cadre personnel that could perform Regulatory Completion beyond FY 2007. 2. EM (DOE-OH and FFI), U.S. Environmental Protection Agency (EPA), and Ohio EPA are negotiating the schedule and logic for the Remedial Action Reports for each of the OUs that will be documented in a Closeout Report Strategy Fact Sheet.

End of current text

1.0 Introduction

The U.S. Department of Energy (DOE) Office of Legacy Management (LM) and Office of Environmental Management (EM) have initiated the transition of the Fernald site into LM for legacy management and for certain legacy worker and contract liabilities. The Site Transition Plan (STP) will serve as the transition/closeout planning document that integrates activities from each of the project closeout phases by identifying organizational and financial responsibilities necessary for attaining Fernald Closure Project (FCP) closeout and obtaining Critical Decision-4 (CD-4) project closeout approval. This Transition Plan documents the approach that EM and LM have agreed upon to ensure an expedient and efficient transition of responsibilities at the site and has been developed in accordance with the Site Transition Framework (STF) guidance. It establishes EM and LM responsibilities, the requirements that each party must meet, provides support for preparation of the critical decision documentation, and has been developed through a collaborative effort between EM and LM staff. The STP is an internal DOE management tool and is not an enforceable regulatory document.

The site is on an accelerated cleanup schedule with an anticipated completion in fiscal year (FY) 2006. Transition and project closeout of the FCP is categorized into three phases: (1) Physical Completion, (2) Regulatory Completion, and (3) Contractual/Financial Closeout. Transition of the FCP site from EM to LM will occur in phases with operational responsibility transferring upon DOE's acceptance of the contractor's Declaration of Physical Completion and financial responsibility transferring upon Regulatory Completion and Final CD-4 package approval. The contractor's Declaration of Physical Completion is defined by the FCP closure contract (DE-AC24-01OH20115) and represents construction of all short and long-term response actions necessary to mitigate environmental and human health risks. For FCP, that includes completion of physical work associated with Operable Unit (OU) 1 through OU4, including restoration of the site in accordance with the Natural Resource Restoration Plan and establishment/installation of all infrastructure necessary for the long-term surveillance and maintenance (LTS&M) of the remedies. The contractor is currently planning a March 31, 2006, declaration of Physical Completion. The FCP closure contract allows for a 14-day DOE review of the declaration for reasonableness; therefore, the planning date of April 19, 2006, is assumed for operational turnover to LM.

A Preliminary CD-4 package will be prepared prior to LM taking operational responsibility. A Final CD-4 package will be completed upon Regulatory Completion to accommodate any changes between the assumptions made at the time of Physical Completion and final resolution of those issues once all requirements of the site transition are complete.

EM Regulatory Completion for the FCP includes finalizing the Remedial Action Reports (RARs) for OU1 through OU4, the Interim RAR for OU5, and the Legacy Management Institutional Controls Plan (LMICP). The final "Terms and Conditions" between EM-1 and LM-1 dated February 15, 2005, state that the budget responsibility for a site remains with EM until the beginning of the fiscal year following cleanup completion. It should be noted that the Terms and Conditions were developed well after negotiation of the FCP closure contract. As a result, the definition of terms for physical completion by 2006 in the closure contract and cleanup completion in the EM/LM transition guidance is not equivalent. Fernald will be utilizing a site-specific strategy to resolve the discrepancy. Since (a) regulatory completion is required to certify that environmental actions have met all requirements and no additional active

management is needed with the exception of long-term response actions in OU5, and (b) FCP Regulatory Completion is not anticipated until mid FY 2007, LM will not become responsible for the site financial requirements until the beginning of FY 2008. LM will assume responsibility for ongoing operation of the aquifer long-term response action at the time of transfer; therefore, LM will be responsible for regulatory completion of OU5 once the aquifer restoration has been completed (estimated in the year 2025). Contractual/financial closeout of administrative matters will be conducted by the EM Consolidated Business Center.

To ensure transition is progressing on schedule, the transition will be managed as a project, with tracking of specific actions within each major transition area (Section 2.0). A timeline of overall milestones and activities that will occur during transition is included in Figure 1 (located in the Executive Summary). The FCP CD-4 and Site Transition implementation approach utilizes a joint EM and LM team following a four-tiered, flow-down concept, which is further discussed in Section 1.3. The joint team will monitor progress against specific actions within each transition area on a monthly basis, which will roll up to quarterly reporting to EM-1/LM-1 against the major milestones under configuration control that are identified in Table 1 (located in the Executive Summary).

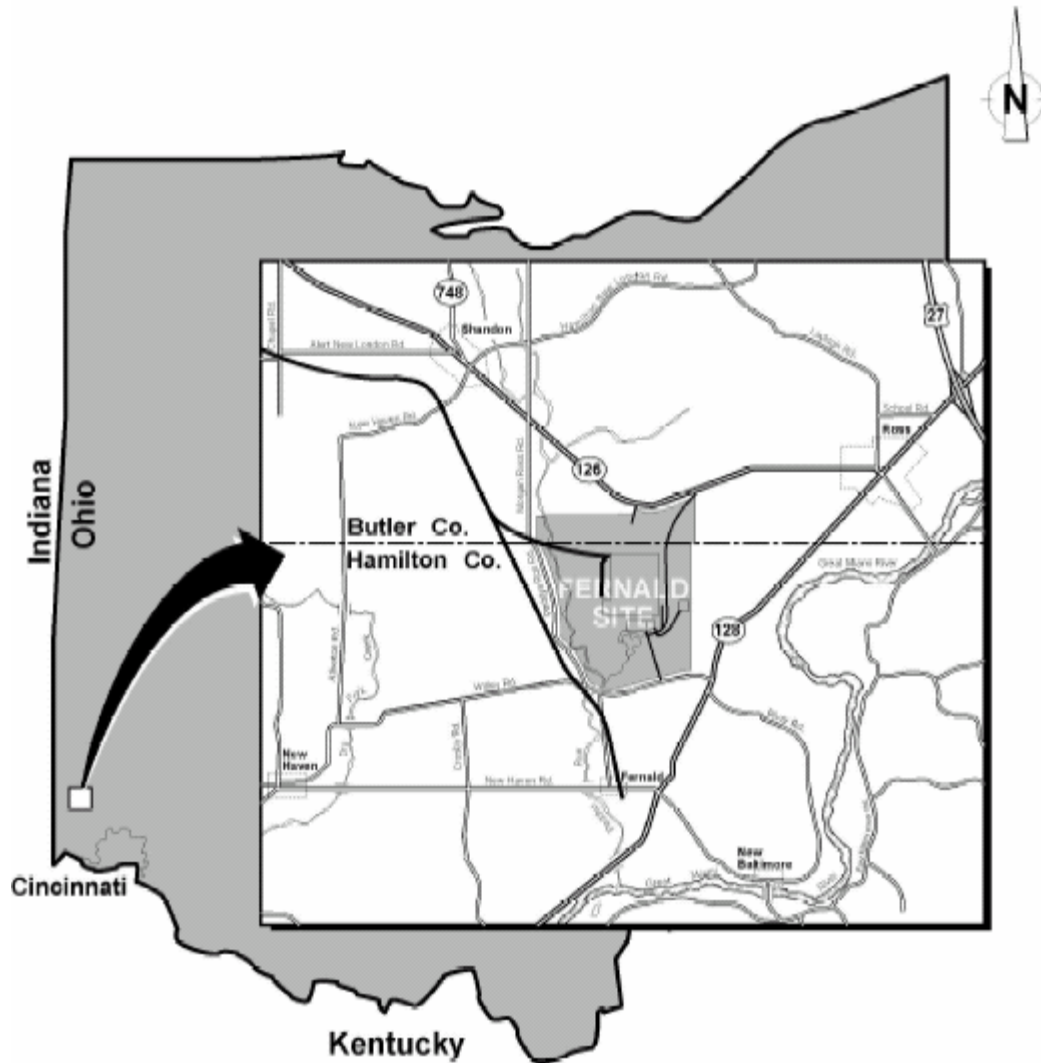
1.1 Site Background

The Fernald site (Figure 2), near Fernald, Ohio, produced “feed material” in the form of purified uranium compounds and metal for use by other government facilities involved in the production of nuclear weapons for the nation’s defense. Uranium metal was produced at the Feed Materials Production Center from 1952 through 1989. The Fernald site was placed on the National Priorities List in 1986. In 1991, the mission of the site officially changed from uranium production to environmental cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended. The site was renamed the Fernald Environmental Management Project. Today, the site is called the FCP to reflect the current mission. Since 1992, Fluor Fernald, Inc., (FFI) has managed the remediation and restoration of the site under the terms of a prime contract with DOE. Region V of the U.S. Environmental Protection Agency (EPA) and the Southwest District Office for the Ohio Environmental Protection Agency (OEPA) provide regulatory oversight. A more complete history of the site is available in the *Legacy Management and Institutional Controls Plan (LMICP)* (DOE 2004). Documentation identifying historical uses, characterization, and many of the remedial actions can be found in the Remedial Investigation/Feasibility Study and remedial action (RA) reports (CERCLA documentation).

The site was divided into five OUs as follows. The remedy for OU1 includes removing all material from the waste pits, stabilizing the material by drying, if necessary, and shipping it off site for disposal. The remedy for OU2 includes removing material from the various units, disposing of material that meets the on-site waste acceptance criteria in the On-Site Disposal Facility (OSDF), and shipping all other material off site for disposal. The remedy for OU3 includes decontaminating and decommissioning all contaminated structures and buildings, recycling waste materials if possible, disposing of material that meets the on-site waste acceptance criteria in the OSDF, and shipping all other material off-site for disposal. The OU4 remedy includes removal and treatment of all material from the silos and shipping it off site for disposal. OU5 includes all environmental media, including soil, surface water, ground water, and vegetation. The OU5 Record of Decision (ROD) describes the approved remediation method of

pump and treat for ground water and also commits to continual evaluation of remediation technologies to allow for the improvement of the remedy with new technologies.

LM requirements and protocols will be documented in the LMICP. The LMICP outlines DOE's approach to LTS&M of the site. Figure 3 shows the conceptual land use for the Fernald property.



The Fernald site covers about 1,050 acres (425 hectares).

Figure 2. Fernald Site Map

FERNALD LEGACY MANAGEMENT

Future Use

LAND USE

- Woodlots
- Prairie
- Wetlands
- Open Water
- On-Site Disposal Facility
- Savanna



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Figure 3. Conceptual Future Land Use

1.2 Goals and Objectives

The primary goal of the Fernald site transition is the efficient closeout of EM site activities and the transfer of all long-term DOE responsibilities from EM to LM in a timely manner with no disruption of services and no negative effects on the ongoing closure mission. An effective transition will be accomplished when (1) LM assumes operational and financial responsibility for all LM activities upon Physical and Regulatory Completions, (2) FCP contractual/financial closeout activities are transferred to other EM entities, and (3) DOE transition documentation meets the requirements of the EM- to LM-transition process.

To accomplish that goal, the following objectives have been established for the transition planning of the FCP from EM to LM:

- Identify all functions, programs, initiatives, activities, assets, etc., requiring transition from EM to LM, or to another EM entity, upon the successful completion of the Fernald site closure.
- Support the preparation of CD-4 documentation for project closeout.
- Establish a common understanding of EM's and LM's financial, programmatic, and legal responsibilities through the transition period.
- Ensure the requirements of the STF are met.
- Identification of functions for early transfer where appropriate and consistent with EM and LM missions.

1.3 Transition Implementation Approach

To accomplish the transition goals and objectives, the FCP CD-4 and site transition implementation approach utilizes a joint EM and LM team following a four-tiered, flow-down concept as illustrated in Figure 4. The uppermost level involves the drivers, which provide a framework of the requirements associated with CD-4 and site transition activities. The primary requirements are DOE Order 413.3, *Program and Project Management for the Acquisition of Capital Assets*, and DOE Order 430.1B, *Real Property and Asset Management*. These requirements have been further clarified in a variety of guidance documents, manuals, memoranda, and fact sheets.

For closure sites, implementation of DOE Order 430.1B is achieved with development of a disposition plan. FCP currently has a validated baseline (scope, schedule, and budget) for activities required to achieve Physical Completion; therefore, disposition planning as required by the DOE order is already complete for this portion of activities. However, activities required from the point of Physical Completion to site turnover to LM have not been developed into a comprehensive project baseline. The STP, or level two of the flow-down concept, is intended to meet DOE requirements for a disposition plan. The STP integrates the high-level requirements for scope, schedule, and budget associated with physical completion, transition, and site turnover to LM. The approach to implementation of the STP will address five key elements:

- Crosswalk to the STF, or LM's "acceptance criteria," for the FCP site;
- Work Breakdown Structure and Task Description, Roles and Responsibilities, Assumptions, and Key Actions;

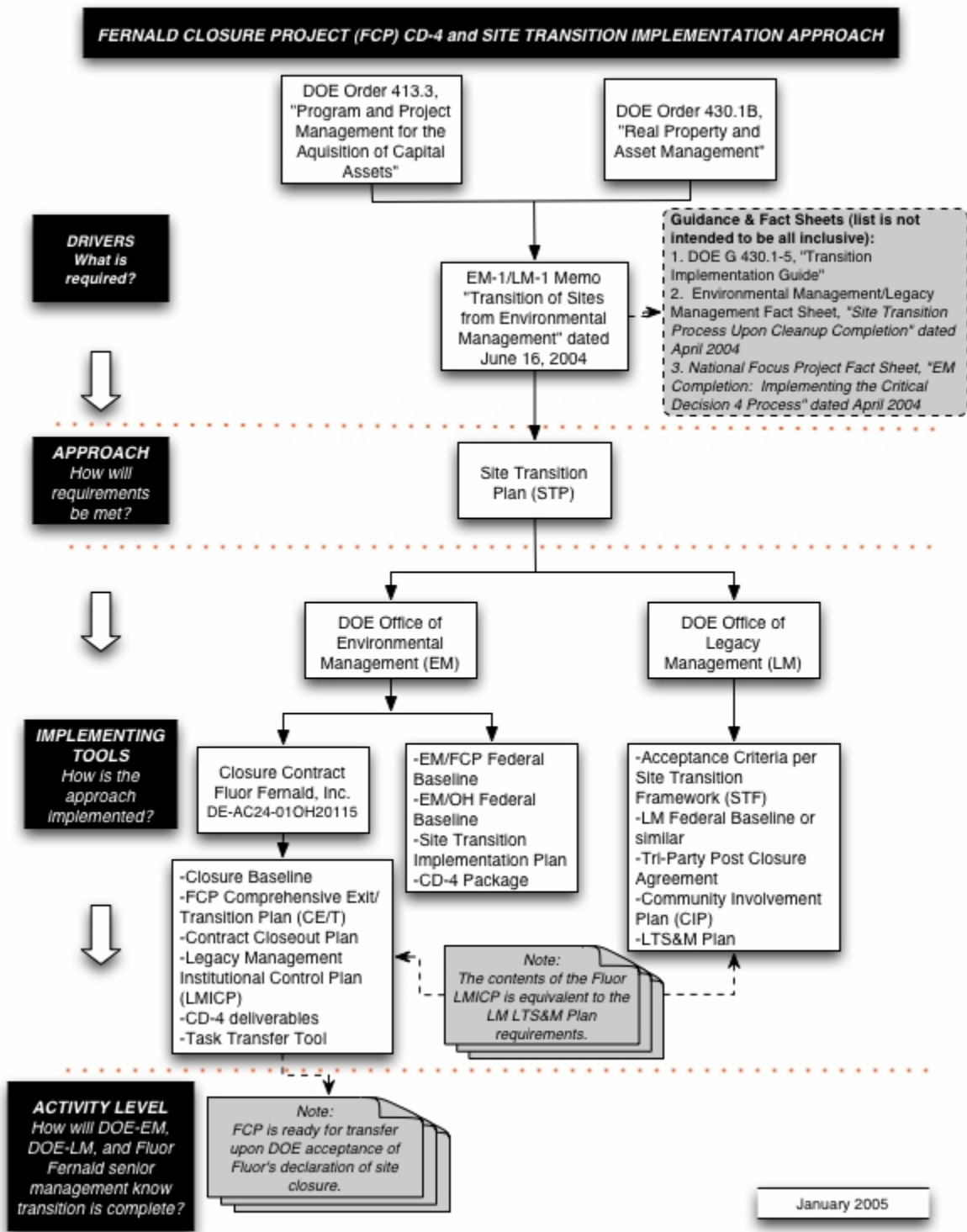


Figure 4. Fernald Closure Project CD-4 and Site Transition Implementation Approach

- Risk Management Plan addressing risks to contract completion and risks to successful transition;
- Post-Closure Life-Cycle Budget; and
- Milestone Schedule and Deliverables under configuration control.

Level three of the flow-down approach involves the site-specific implementation tools for the two primary DOE organizations: LM and the DOE Office of Environmental Management, Ohio Field Office, and Fernald Closure Project (EM/OH/FCP). EM/OH/FCP implements site restoration activities via Closure Contract DE-AC24-01OH20115 with FFI (the site contractor). Existing deliverables under the contract will be validated to satisfy STP requirements as appropriate. Specifically, the approved closure baseline, the Comprehensive Exit/Transition Plan (CE/TP), contract closeout plan, LMICP, and CD-4 documentation will address portions of the site transition requirements of the STP and CD-4 verification process. EM/OH/FCP activities are implemented using a resource-loaded federal baseline. Any additional activities identified during the transition planning will be included in the federal baseline. The LM acceptance criteria are identified in the STF, and key activities such as the possible negotiation of a Tri-Party Post-Closure Agreement will be documented in a LM Federal Baseline, or equivalent tool. Readiness for transfer to LM, or completion of CD-4 requirements, will be jointly verified and documented by EM/OH/FCP and LM for level four of the flow-down approach.

1.4 Major Transition Assumptions

Major transition assumptions include the following:

- The site contractor will submit a Declaration of Physical Completion (which includes completion of the silos project via off-site storage or disposition of the waste material in the silos) by March 31, 2006.
- EM will accept the contractor's Declaration of Physical Completion as reasonable by April 19, 2006.
- Adequate EM resources will be available through December 31, 2006, at which point continued support will be available from other EM sites, the Consolidated Business Center (CBC), or EM contractors.
- LM will have adequate funding, personnel, and site management contracts to accept operational responsibility of the site as early as April 19, 2006.
- The site will transition operational responsibility for legacy management activities from EM to LM utilizing EM budget for FY 2006 (the period following the contractor's declaration of physical completion) and FY 2007. LM budget will be utilized for FY 2008 and beyond.
- EM will remain responsible for Regulatory Completion (with the exception of OU5) and Contractual/Financial Closeout. LM will be responsible for Regulatory Completion of OU5 because of the long-term aquifer response action.
- Responsibility for, and ownership of, the Fernald site will remain with the Federal Government in perpetuity.

1.5 Risk Planning

Management of the uncertainties associated with the major assumptions will be addressed on a case-by-case basis as the need arises. Risk planning efforts to ensure risks are accepted, avoided, or mitigated will be addressed during the transition planning efforts. Three primary activities are performed in the risk management process:

- Identification of risks: a regular effort to identify and document risks associated with the closure and transition of the OH sites.
- Analysis of risks: an estimation of the probability, impact, and prioritization of risks relative to each other to support a risk-handling strategy, some of which will require a mitigation plan.
- Tracking and controlling risks: collecting and reporting status information about risks and their mitigation plans (where appropriate) and taking corrective action as needed

Risks include a statement of the risk condition, consequence, and risk-handling strategy. Consequence will be determined by a qualitative analysis of risk probability and impact, indicated as High, Medium, or Low. The risk-handling strategy will be to either (1) accept and watch or (2) develop a mitigation plan. Activities with a ranking of high consequence require the development of a risk mitigation plan. Mitigation plans for activities with lower consequences will be developed on an as needed basis as determined by the FCP Transition Team. Assessment of status against identified risks and mitigation plans will be performed during the monthly OH project reviews and by the FCP Transition Team. Newly identified risks will also be included at that time.

Table 2 (located in the Executive Summary) provides a summary of the key uncertainties associated with the transition process and the risk-handling strategy for each. The status will be provided in the quarterly transition status reports to EM-1 and LM-1. A more detailed description of the uncertainties and risk-handling strategy by functional area is provided in Section 2.0.

2.0 Status of Site Transition

The Site Transition Framework is a tool that is used to verify that all appropriate steps have been or will be taken to close out the site by establishing requirements in 10 functional areas:

1. Authorities and Accountabilities
2. Site Conditions
3. Engineered Controls, Operation and Maintenance, Emergency/Contingency Planning
4. Institutional Controls, Real and Personal Property, and Enforcement Authorities
5. Regulatory Requirements and Authorities
6. Long-Term Surveillance and Maintenance Budget, Funding, and Personnel
7. Information and Records Management
8. Public Education, Outreach, Information, and Notice
9. Natural, Cultural, and Historical Resource Management
10. Business Closure Functions, Pensions and Benefits, Contract Closeout or Transfer

The subsequent sections of this chapter provide a brief explanation of the above functional areas and the status of each. Status is presented in the following manner: (1) Status and Approach at Signing of This Transition Plan; (2) Expected Conditions at Transition/Transfer; (3) Major Actions, Lead Organization, and Schedule; and (4) Key Uncertainties, Risk, and Risk Mitigation Strategies.

The major milestones, representing completion dates of key activities necessary to maintain the transition assumptions identified in Section 1.4, are listed in Table 1 (located in the Executive Summary). The status of milestones identified in Table 1 and progress against risk handling strategies for the high risk activities identified in Table 2 will be included in the quarterly transition status reports to EM-1 and LM-1. More detailed descriptions of the transition milestones by functional area are provided in Section 2.0. Milestones identified in Section 2.0 that are not listed in Table 1 are not under EM-1 and LM-1 configuration control and will not be included in quarterly reporting. These milestones have been included to illustrate the general logic and timing of key activities between now and transition but may contain float. Therefore, milestones and risk handling strategies identified in Section 2.0 may be revised by the FCP Transition Team to manage project risks as appropriate. Because of the nature of the site transition framework, many of the assumptions, conditions at transition/transfer, and major actions/uncertainties contain repeated themes throughout the 10 functional areas. An attempt has been made in this plan to reduce these redundancies. For example, the completion of the LMICP and settlement of the National Resource Damage (NRD) suit have tangible impacts to most of the areas but are only discussed in the one or two areas that are most directly applicable. Redundancies that remain in this plan were intentionally left to ensure full understanding of the context of the issue.

2.1 Authorities and Accountabilities

Sites are required to ensure all documents allocating roles and responsibilities of interested parties have been approved and signed, to identify responsibilities and funding for legacy management activities, and to determine whether the appropriate government policies and procedures for managing resources are incorporated in the LMICP and respective agreements.

2.1.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH) is completing remediation of the site through a closure contract (Contract DE-AC24-01OH20115) with FFI.
- EM (DOE-OH and FFI) and LM have resolved the planning dates of operational and financial turnover to LM.
- LM is preparing to assume operational responsibility as early as April 19, 2006.
- EM-1 and LM-1 have finalized Terms and Conditions for transition of EM sites.
- EM-CBC has been established and is expected to operationally stand up by June 2005.

2.1.2 Expected Site Conditions at Transition/Transfer

- EM-1 and LM-1 Terms and Conditions for transition of EM sites will remain consistent with the version dated February 15, 2005.
- EM-CBC will have assumed responsibility for Regulatory Completion and Contractual/Financial Closeout of the site.
- EM (DOE-OH) will have identified funding sources for each activity in FY 2007 budget requests and LM will have identified funding sources for each activity in FY 2008 budget requests (see Section 2.6).

2.1.3 Major Actions, Lead Organization, and Schedule

- EM (DOE-OH), in consultation with LM, will submit a quarterly report on transition activities to EM-1 and LM-1 beginning April 2005 covering the second quarter of the FY. EM (CBC-Cadre), in consultation with LM, will submit quarterly reports on transition to EM-1 and LM-1 beginning January 2007.
- EM-CBC will assume Contractual/Financial Closeout responsibility no later than March 31, 2006.
- FFI will accomplish the Declaration of Physical Completion by March 31, 2006.
- EM (DOE-OH/CBC), in consultation with LM, will accept FFI's Declaration of Physical Completion as reasonable by April 19, 2006.
- LM will be ready to assume operational responsibility as early as April 19, 2006.

2.1.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Authorities and Accountabilities		
Risk Condition	Consequence	Risk-Handling Strategy
The ability of FFI to achieve Physical Completion by March 31, 2006, is uncertain.	HIGH: If project risks to completion (e.g., waste disposition pathways discussed in subsequent sections) are not resolved, the March 31, 2006, Declaration of Physical Completion is in jeopardy.	MITIGATION PLAN: 1. LM subcontracts will be written to begin as early as April 19, 2006, but with flexibility in the start date. 2. Assume operational transfer in FY 2006 but financial transfer in FY 2008 due to regulatory completion activities that will extend into FY 2007. This will also allow a contingency period for any slippage in the Declaration of Physical Completion. 3. Procurement strategy is in place to remove the waste (either temporarily or permanently) to an off-site permitted facility.

2.2 Site Conditions

Sites are required to ensure that all remedies and remaining hazards have been identified and documented at Physical Completion, to complete a conceptual model for LM, to ensure that all remedial actions(s) and associated documentation have been completed and approved by regulators, and to identify and document any NRD claims.

2.2.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH and FFI) is implementing restoration of the site in accordance with the Records of Decision (RODs) for OU1-OU5.
- EM (DOE-OH and FFI) is converting the existing Advanced Wastewater Treatment (AWWT) facility to the smaller Converted Advanced Wastewater Treatment (CAWWT) facility.
- EM (DOE-OH and FFI) is completing decontamination and dismantlement (D&D) and soil remediation of the site. The OSDF has three cells filled and capped, one cell filled and in the process of being capped, and four cells in the process of being filled.
- EM (DOE-OH and FFI) is completing 13 Natural Resource Restoration projects in anticipation of NRD Settlement.
- EM (DOE-OH) is negotiating settlement of the NRD suit with the OEPA.
- LM is preparing to assume responsibility for management of DOE property, all surveillance and maintenance requirements, and completion of OU5 (including the final Remedial Action Report for OU5).

2.2.2 Expected Site Conditions at Transition/Transfer

- EM (DOE-OH and FFI) will have installed all infrastructure necessary for LTS&M of the remedies. This includes an information repository, the OSDF, a wastewater treatment facility, and the aquifer remediation-related infrastructure. The OSDF will occupy 75 acres of the site; the remainder of the site consists of 140 acres of wetland and ponds, 360 acres of savanna/prairie grass, 49 acres infrastructure/set aside, and approximately 400 acres of wooded land (see conceptual representation shown on Figure 3).
- EM (DOE-OH and FFI) will have ensured that the expected conditions of the site are adequately understood and documented in five RODs, Remedial Action Reports for OU1 through OU4, and the Interim Remedial Action report for OU5.
- EM (DOE-OH and FFI) will have completed 13 Natural Resource Restoration projects in support of NRD Settlement.
- EM (DOE-OH and FFI), in consultation with LM, will have negotiated the terms of acceptance of the Declaration of Physical Completion via the CE/TP document.
- EM (DOE-OH), in consultation with LM, will have finalized and implemented the NRD Settlement.

2.2.3 Major Actions, Lead Organization, and Schedule

- FFI will complete the conversion of the existing AWWT facility to the smaller CAWWT by February 28, 2005. (**COMPLETE**)
- EM (DOE-OH/CBC and FFI), in consultation with LM, will negotiate terms of acceptance of the Declaration of Physical Completion via the CE/TP document by March 31, 2005.
- EM (DOE-OH), in consultation with LM, will finalize terms of the NRD Settlement by July 1, 2005 (identified as a major milestone in the Executive Summary).
- FFI will complete OU4 (silos), including D&D and waste management, by March 31, 2006.
- EM-CBC-Cadre, in consultation with LM, will finalize the Remedial Action Reports for OU1 through OU4 and the Interim Remedial Action Report for OU5 by September 30, 2007.
- LM will finalize the Remedial Action Report for OU5 upon completion of the aquifer long-term response action (estimated in the year 2025).

2.2.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Site Conditions		
Risk Condition	Consequence	Risk-Handling Strategy
A disposition path for the OU4 (silos) waste critical path project has not been identified.	HIGH: Physical Completion cannot occur without removal of the silo waste from the site. If a disposal contract is not in place by the date that FFI declares readiness on the silos project (currently projected for March 7, 2005), the ability for FFI to declare Physical Completion by March 31, 2006, is in jeopardy.	MITIGATION PLAN: <ol style="list-style-type: none"> 1. LM subcontracts will be written to begin as early as April 19, 2006, but with flexibility in the start date. 2. Assume operational transfer in FY 2006 but financial transfer in FY 2008 due to regulatory completion activities that will extend into FY 2007. This will also allow a contingency period for any slippage in the declaration of physical completion. 3. EM (DOE-OH) and FFI partial risk mitigation/procurement strategy is in place to remove the waste (either temporarily or permanently) to an off site permitted facility.
The ability of FFI to disposition remediation equipment and waste generated in projects completing on or near the March 31, 2006, Physical Completion date is uncertain.	MEDIUM: Because some remediation equipment will be used up until the point of Physical Completion and newly generated waste will result from ongoing operations (i.e., CAWWT), it is not reasonable to assume all equipment and waste will be dispositioned by the date of declaration. Failure to negotiate reasonable acceptance criteria could delay DOE's acceptance of Physical Completion.	MITIGATION PLAN: <ol style="list-style-type: none"> 1. EM (DOE-OH) and FFI will negotiate acceptable inventories of equipment and waste that may be dispositioned in a reasonable timeframe post Physical Completion by March 31, 2005, using the CE/TP.

Site Conditions		
Risk Condition	Consequence	Risk-Handling Strategy
The infrastructure requirements resulting from the terms of the NRD Settlement are uncertain.	MEDIUM: Delay in finalization of the settlement terms may delay the ability of FFI to implement required infrastructure prior to the planning date for FFI Physical Completion.	ACCEPT AND WATCH: If NRD Settlement is not obtained by July 1, 2005, then develop mitigation plan.
A disposition path for the orphan RCRA waste container (i.e., Polychlorinated Biphenyl (PCB) and F027 waste) is uncertain.	MEDIUM: Physical Completion cannot be achieved without identification of a temporary storage or disposition pathway for the orphan waste.	ACCEPT AND WATCH: FFI is established a disposition milestone of September 30, 2005 for the orphan waste. If an off-site storage location or disposition pathway is not identified by the milestone, a mitigation plan for transition should be developed.

2.3 Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning

Sites are required to identify and document all engineering controls and operations and maintenance (O&M) activities, to identify contractor activities and provide funding to perform the work, and to identify any engineering/contingency planning, authority, and responsibilities.

2.3.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH and FFI) is responsible for all O&M requirements including emergency contingency planning for an information repository, the completed OSDF cells, the AWWT, and the aquifer remediation-related infrastructure.
- EM (DOE-OH and FFI), in consultation with LM, is negotiating the Draft LMICP with federal and state regulators following issuance of the plan in July 2004.
- EM (DOE-OH and FFI), in consultation with LM, is developing a Comprehensive Ground Water Exit Strategy for the aquifer long-term response action.
- EM (DOE-OH and FFI), in consultation with LM, is continuing negotiation with regulators regarding the definition of restored area success in order to define monitoring and maintenance requirements.
- LM, in consultation with EM (DOE-OH), has initiated preliminary discussions with local county parks for possible arrangements regarding post-closure management of the site (excluding the OSDF, CAWWT, and aquifer remediation facilities).

2.3.2 Expected Conditions at Transition/Transfer

- EM (DOE-OH and FFI), in consultation with LM, will have established and implemented engineered controls for the OSDF, an active ground water treatment system, aquifer remediation infrastructure, and the new water treatment facility (CAWWT).
- EM (DOE-OH and FFI) will have transferred engineering drawings, as-builts, maps, and other site documentation to LM.
- EM (DOE-OH and FFI), in consultation with LM, will have developed a site-specific hazard analysis document for the FCP conditions post-closure.

- EM (DOE-OH and FFI), in consultation with LM and EM-CBC, will have developed a Site Emergency Plan.
- LM, in consultation with EM (DOE-OH), will have established post-closure management of the site for areas excluding the OSDF, CAWWT, and aquifer remediation facilities.
- EM (DOE-OH and FFI), in consultation with LM, will have completed the LMICP (which serves as the LM FCP LTS&M Plan).
- LM will have ensured all resources and management contracts are in place to assume operational responsibility.

2.3.3 Major Actions, Lead Organization, and Schedule

- EM (DOE-OH and FFI) will complete a final approved O&M Plan for the CAWWT by January 31, 2006.
- EM (DOE-OH and FFI) will provide LM operational history, as-built drawings, and O&M procedures for the OSDF and CAWWT by March 31, 2006.
- EM (DOE-OH/CBC) will terminate agreements with local hospitals and the subcontracted response force for emergency services by April 19, 2006. LM will ensure the provision of emergency services to the site by April 19, 2006.
- LM assumes operational responsibility and complete procedures, contracts, and/or agreements and trains resources for monitoring and maintenance of the site in accordance with the LMICP by April 19, 2006 (identified as a major milestone in the Executive Summary).
- EM (DOE-OH and FFI), in consultation with LM, will complete an approved ground water exit strategy by March 31, 2006.
- EM (DOE-OH and FFI), in consultation with LM, will complete an approved LMICP by January 31, 2006 (identified as a major milestone in the Executive Summary).

2.3.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning		
Risk Condition	Consequence	Risk-Handling Strategy
The ability of LM to complete procedures, negotiate contracts and/or agreements, and train resources for monitoring and maintenance of the site by April 19, 2006, is uncertain.	HIGH: The date at which procurement activities and resource training activities need to begin to ensure timely completion will be before all long-term monitoring requirements have been fully established by EM.	MITIGATION PLAN: 1. LM will begin procurement activities by July 30, 2005. EM (DOE-OH and FFI) will provide the most current information on the OSDF, CAWWT, NRD Settlement, etc., to support development of the Statements of Work.

Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning		
Risk Condition	Consequence	Risk-Handling Strategy
Post-closure O&M responsibilities resulting from the NRD Settlement are unknown.	MEDIUM: Delay in NRD Settlement and negotiation of criteria for restored area monitoring and maintenance beyond July 1, 2005, impacts completion of the LMICP.	MITIGATION PLAN: 1. EM (DOE-OH) will negotiate terms of the draft Settlement by February 1, 2005. (COMPLETE) 2. EM (DOE-OH) will finalize the Settlement by July 1, 2005, to allow completion of the Final LMICP by January 31, 2006.
The regulatory time frame for approval of institutional controls is uncertain.	MEDIUM: Timely regulatory approval is necessary to allow for incorporation of institutional controls (ICs) into the Final LMICP by January 31, 2006. Delay in regulatory approval could impact FFI's ability to complete the LMICP by the Declaration of Physical Completion as required by the closure contract.	MITIGATION PLAN: 1. EM (DOE-OH) and FFI will provide interim revisions to the LMICP in July 2004 (COMPLETE) and March 2005. 2. EM (DOE-OH) and FFI will provide regulators with preliminary proposals of institutional controls for the CAWWT to ensure maximum time for review and approval.

2.4 Institutional Controls, Real and Personal Property, and Enforcement Authorities

Sites are required to identify and document all land use/institutional controls (ICs), to ensure that they are approved by the regulators and implemented and to ensure that property records are complete.

2.4.1 Status and Approach at Signing of This Transition Plan

- The site is federally owned.
- EM (DOE-OH and FFI) has numerous easements and rights-of-entry agreements established with surrounding property owners.
- EM (DOE-OH and FFI) has been routinely dispositioning personal property in accordance with applicable regulations.

2.4.2 Expected Conditions at Transition/Transfer

- The site will remain in federal ownership in perpetuity.
- EM (DOE-OH/CBC and FFI) will have documented the real estate history of the site, including identification of former property owners, deed restrictions, and other land-use restrictions.
- EM (DOE-OH/CBC and FFI) will have established and documented on-site and off-site real estate instruments (easements, rights-of-way, etc.).
- EM (DOE-OH/CBC and FFI) will have transferred all personal property not identified by LM as necessary for post-closure activities in accordance with applicable regulations.
- EM (DOE-OH/CBC and FFI) will have updated the Facility Information Management System (FIMS) database to reflect the conditions at transfer.

2.4.3 Major Actions, Lead Organization, and Schedule

- EM (DOE-OH and FFI) and LM will identify the process for identification of post-closure personal property needs by March 1, 2005. **(COMPLETE)**
- EM (DOE-OH/CBC and FFI), in consultation with LM, will request exemption to new FIMS requirements and approval to perform advanced archiving by September 30, 2005.
- LM will conduct an interim assessment regarding the active real property records by October 1, 2005.
- EM (DOE-OH/CBC, and FFI), in consultation with LM, will evaluate real property interests and terminate unneeded interests by March 31, 2006.
- EM (DOE-OH/CBC, and FFI), in consultation with LM, will have completed archival of the FIMS database by March 31, 2006.
- LM will accept active real property records by October 1, 2007 (identified as a major milestone in the Executive Summary).

2.4.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Institutional Controls, Real and Personal Property, and Enforcement Authorities		
Risk Condition	Consequence	Risk-Handling Strategy
Active real property records do not meet DOE criteria for transfer.	HIGH: EM (DOE-OH) has not had a certified real estate specialist on staff. Records consist of varying individual filing systems used for several years, with a varying degree of quality. If active real property records do not meet DOE criteria for transfer, the CD-4 package will be delayed, thereby delaying LM acceptance of the site.	MITIGATION PLAN: 1. Joint Richland (currently providing real estate support to EM (DOE-OH)) and LM assessment of OH records in FY 2004 to identify actions to be completed for real property records to meet DOE criteria for transfer. 2. DOE-Richland quarterly follow-up assessments to be conducted in FY 2005 to monitor progress and perform interim acceptance of completed portions of the records. 3. LM to conduct an interim check by October 1, 2005.
The ability of FFI to disposition personal property used in projects completing on or near the March 31, 2006, Physical Completion date is uncertain.	HIGH: Because some personal property will be used up until the point of Physical Completion, it is not reasonable to assume all equipment and waste will be dispositioned by the date of declaration. Failure to negotiate reasonable acceptance criteria could delay DOE's acceptance of Physical Completion.	MITIGATION PLAN: 1. EM (DOE-OH) and FFI will negotiate acceptable inventories of equipment and waste that may be dispositioned in a reasonable timeframe post Physical Completion by March 31, 2005, via the CE/TP.

2.5 Regulatory Requirements and Authorities

Sites are required to identify all regulatory decision documents and associated site characterizations that have been completed or closed out, to verify that implemented remedy and associated LTS&M activities are in compliance with regulatory requirements and to make available any future reviews that are planned and consistent with guidance. Sites are required to communicate status and path forward on any applicable regulatory requirements, such as Resource Conservation and Recovery Act (RCRA) permits and U.S. Nuclear Regulatory Commission licenses and to identify the location of pertinent regulatory documents and to ensure a maintenance schedule or process is in place.

2.5.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH and FFI) is working on all regulatory decision documents in support of remedies for OU1 through OU5.
- EM (DOE-OH and FFI) is beginning to sunset permits and agreements.
- LM is evaluating the need for a Post-Closure Tri-Party (DOE, USEPA, and OEPA) Agreement.

2.5.2 Expected Conditions at Transition/Transfer

- EM (DOE-OH and FFI) will have sunset all permits and agreements not required for LM activities and will have transferred those required for LM activities to LM.
- LM will have protocols in place to adhere to existing/unclosed regulatory agreements upon acceptance of operational responsibility for the site while Regulatory Completion is finalized.
- LM, in consultation with EM-OH, will have determined the scope and will have negotiated the Post-Closure Tri-Party Agreement as appropriate.

2.5.3 Major Actions, Lead Organization, and Schedule

- EM (DOE-OH and FFI) will transfer regulatory programs (i.e., National Pollutant Discharge Elimination System, RCRA, Superfund Amendments and Reauthorization Act) by April 19, 2006.
- EM (DOE-OH/CBC-Cadre), in consultation with LM, will complete the second Five Year CERCLA report by May 30, 2006.
- EM-CBC-Cadre, in consultation with LM, will complete the annual site environmental report using calendar year 2005 data by June 30, 2006.
- EM-CBC-Cadre will satisfy the Amended Consent Agreement (ACA) for OU1 through OU4 by September 30, 2007 (identified as a major milestone in the Executive Summary).
- EM-CBC-Cadre, in consultation with LM, will close out portions of regulatory components including the ACA and the Amended Consent Decree (ACD) by September 30, 2007.
- LM will accept the remaining portions of the existing regulatory agreements for the LMICP and OU5 by September 30, 2007 (identified as a major milestone in the Executive Summary).

- LM, in consultation with EM-CBC-Cadre, will negotiate a Post-Closure Tri-Party Agreement (if determined necessary) by September 30, 2007.

2.5.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Regulatory Requirements and Authorities		
Risk Condition	Consequence	Risk-Handling Strategy
The ACD is unclear concerning when the State will declare completion.	MEDIUM: The ACD defines termination as “provisions of this Agreement shall be deemed satisfied upon the receipt of written notice from EPA that DOE has demonstrated to EPA’s satisfaction that all terms of this agreement have been completed.” Specific regulator expectations have not been defined at this time.	MITIGATION PLAN: 1. EM (DOE-OH and FFI), USEPA, and OEPA are negotiating the schedule and logic for the RARs and Preliminary Closeout Reports (PCORs) for each of the OUs that will be documented in a Closeout Report Strategy Fact Sheet. 2. A court date will be requested upon regulator acceptance of the RARs.
The time frame necessary for LM to negotiate a Post-Closure Tri-Party Agreement is uncertain.	LOW: The existing regulatory agreements are heavily focused on remedial investigation and remedial design; not post-remedy and long-term response action needs.	ACCEPT AND WATCH: The existing FFA would be acceptable to support the LTS&M activities until a new Post-Closure Tri-Party Agreement is negotiated.

2.6 Long-Term Surveillance and Maintenance Budget, Funding, and Personnel

Sites are required to develop technical baseline documents for LM activities and to identify personnel requirements necessary for such activities.

2.6.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH) has conducted a functional analysis in determining life-cycle federal staff requirements and transfer of function to the EM-CBC.
- EM (DOE-OH and FFI) is developing cost estimates for legacy management for FY 2007 through FY 2012.

2.6.2 Expected Conditions at Transition/Transfer

- EM (DOE-OH) will have 44 full-time equivalents (FTEs) by October 1, 2005 supporting all Ohio functions. EM (DOE-OH) will “sunset” federal FTEs to zero in FY 2007 following mission completion at Ashtabula/Columbus/Fernald/Mound Projects, transfer of contract closeout responsibilities to the EM-CBC, and transfer of West Valley Demonstration Project FTE’s to another EM entity.
- EM (DOE-OH) FTE requirements for transition will have been supported by EM-CBC and LM.
- LM will have ensured personnel are trained and ready to perform LM tasks according to approved plans and procedures.
- EM (DOE-OH) will have requested funding through FY 2007. EM-CBC will have provided all funding for LM activities from Physical Completion through the end of FY 2007. LM will have requested funding for LM activities starting in FY 2008.

- EM (DOE-OH), in consultation with LM, will have developed a validated baseline and supporting basis of cost estimates.

2.6.3 Major Actions, Lead Organization, and Schedule

- EM (DOE-OH), in consultation with LM, will have developed a validated baseline and supporting basis of cost estimates for five years post closure by March 31, 2004.
- EM (DOE-OH and FFI), in consultation with LM, will prepare funding requests for FY 2007 beginning in February 2005.
- LM, in consultation with EM (DOE-OH/CBC), will prepare a staffing/resource plan through FY 2025 by March 31, 2005.
- LM, in consultation with the EM-CBC, will prepare funding requests for FY 2008 and beyond beginning in February 2006.
- LM, in consultation with EM-CBC, completes the Program Budget Decision for FY 2008 by April 15, 2006 (identified as a major milestone in the Executive Summary).
- LM will secure and train required human resources and have required material resources in place as early as April 19, 2006.
- EM-CBC-Cadre, in consultation with LM, will have completed an Environmental Liability Estimate in accordance with department policies and procedures by September 30, 2007.

2.6.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Long-Term Surveillance and Maintenance Budget, Funding and Personnel		
Risk Condition	Consequence	Risk-Handling Strategy
Potential post-closure financial responsibilities resulting from the Natural Resource Damage (NRD) Settlement are unknown.	HIGH: The results of the NRD Settlement need to be defined by the February 2005 time frame to support the budget formulation process for FY 2007 or there may be inadequate funds to implement the settlement.	MITIGATION PLAN: 1. EM (DOE-OH), in consultation with LM, will negotiate draft terms of the agreement prior to the budget formulation process for FY 2007. (COMPLETE) 2. EM (DOE-OH), in consultation with LM, will include a planning assumption for the settlement costs in the FY 2007 budget formulation process.
The EM-1/LM-1 Terms and Conditions requiring a validated baseline two years prior to closure were not issued until February 15, 2005.	HIGH: EM (DOE-OH) has not begun development of a validated baseline. Additionally, current project activities will significantly be changing the assumptions that will support the baseline.	MITIGATION PLAN: 1. EM (DOE-OH and FFI) will identify assumptions and costs from February – April 15, 2005 to support the FY 2007 budget formulation process. 2. EM (DOE-OH and CBC) will develop the baseline once key assumptions can be defined upon completion of the conversion to the CAWWT and identification of the silos waste disposition path.

Long-Term Surveillance and Maintenance Budget, Funding and Personnel		
Risk Condition	Consequence	Risk-Handling Strategy
The number of EM personnel necessary to resolve regulatory comments on the RARs for OU1-OU4 and interim RAR for OU5 is uncertain.	MEDIUM: Regulatory Completion is not anticipated for 6-12 months following Physical Completion; therefore, FFI will have completed its contractual requirements and EM (DOE-OH) will have responsibility for regulatory negotiations and revisions.	MITIGATION PLAN: 1. EM (DOE-OH) will prepare a Memorandum of Agreement (MOA) or similar document for the transfer of identified functions and responsibilities to the EM-CBC. (COMPLETE) 3. FFI will ensure that the format and quality of the documents meet previously approved RARs to minimize comments and revisions.

2.7 Information and Records Management

Sites are required to identify and transfer all site information and records and to perform information management planning as required. EM is required to identify and disposition all records. EM will determine which contract records will be needed for contract closeout. LM will work with EM to determine which records are required for LM.

2.7.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH and FFI) is dispositioning records in accordance with all federal regulations; National Archives and Records Administration (NARA); and DOE orders (Draft DOE Order 243.X, *Records Management Program* and DOE Order 200.1, *Information Management Program*), 36 CFR, and 44 U.S.C., FCP's *Records Management Transition Plan*, and LM's *Information and Records Management Transition Guidance*.
- EM (DOE-OH and FFI) has no classified records associated with the Fernald project.
- LM, in consultation with EM (DOE-OH and FFI), is evaluating existing computer applications and electronic databases to determine future requirements.
- EM (DOE-OH and FFI) has Energy Employees Occupational Illness Compensation Program Act (EEOICPA) record responsibilities.

2.7.2 Expected Conditions at Transition/Transfer

- EM (DOE-OH and FFI), in consultation with LM, will have met all regulatory requirements regarding records, including the archival and disposition of records per the NARA record schedules to an approved record storage facility.
- EM (DOE-OH/CBC and FFI) will have continued to update the Administrative Record on a quarterly basis through Regulatory Completion.
- EM (DOE-OH) will have transferred records needed for (1) ongoing litigation and EEOICPA claims and (2) business/financial closeout to the EM-CBC.
- Custody of EM (DOE-OH) records will be transferred to LM with the exception of those records required for contract closeout, on-going litigation, Freedom of Information Act /Privacy Act requests, and ongoing Energy employees Occupational Illness Compensation Program Act (EEOICPA) claims.

- EM (DOE-OH/CBC), in consultation with LM, will have completed the electronic conversion and transferred environmental and record databases. LM will have the required computer applications and databases that are necessary to support all LM activities and accommodate access and finding of Fernald records.
- EM (DOE-OH/CBC), in consultation with LM, will have digitized the CERCLA AR.
- LM will have assumed EEOICPA record responsibilities for new claims.
- LM will have become custodian for records, including disposition, access, and retention.
- EM (DOE-OH) will have dispositioned contaminated records.

2.7.3 Major Actions, Lead Organization, and Schedule

- EM (DOE-OH), in consultation with LM, will develop an Information and Records Management Transition Plan (IRMTP) in accordance with the Legacy Management Information and Records Management Transition Guidance by September 30, 2005.
- EM (DOE-OH/CBC) and LM will determine which organization will be responsible for various aspects of EEOICPA by September 30, 2005.
- LM, in consultation with EM (DOE-OH and FFI), will identify database licenses and a schedule for transfer by October 1, 2005.
- LM, in consultation with EM (DOE-OH and FFI), will identify the location, use, and occupancy of the Public Environmental Information Center and implement by March 31, 2006.
- EM (FFI) will continue to update the AR on a quarterly basis through the Declaration of Physical Completion (assumed March 31, 2006). EM (DOE-OH/CBC) will update the AR from March 31, 2006 until September 30, 2007 and transfer to LM. LM will update the AR as of October 1, 2007.
- EM (DOE-OH) completes the conversion of environmental and record data by March 31, 2006.
- EM (DOE-OH) will complete the transfer of electronic and paper records to LM by April 19, 2006 (identified as a major milestone in the Executive Summary). This will include compiling, preparing and turning over the final inventory of FCP records (including any special record collections); finding aids; all Standard Form (SF)-135s, SF-258s, and SF-115s; and documentation for future records retrieval.
- EM (DOE-OH/CBC) completes the digitization of the AR by September 30, 2007.

2.7.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Information and Records Management		
Risk Condition	Consequence	Risk-Handling Strategy
The ability to identify the location, use, and occupancy of the Public Environmental Information Center is contingent upon final NRD Settlement.	HIGH: If EM (DOE-OH) is unable to complete the NRD Settlement by July 1, 2005, FFI will have inadequate time to implement the terms by the Physical Completion date of March 31, 2006.	MITIGATION PLAN: <ol style="list-style-type: none"> EM (DOE-OH) will negotiate terms of the draft Settlement by February 1, 2005. (COMPLETE) EM (DOE-OH) will finalize the Settlement by July 1, 2005. EM (DOE-OH and FFI), in consultation with LM, will provide a decision whether the trailer/warehouse will remain, whether it's on site/off site, and who will be occupying by August 1, 2005.
Electronic conversion of environmental and record data is not included in the scope of the closure contract but is identified in the February 15, 2005, EM-1/LM-1 Terms and Conditions.	HIGH: Cost and schedule implications to perform these tasks have not been fully evaluated.	MITIGATION PLAN: <ol style="list-style-type: none"> LM, in consultation with EM (DOE-OH and FFI), are evaluating existing computer applications and databases to determine future requirements by May 31, 2005. EM (DOE-OH and FFI) will identify cost and schedule impacts of requested conversions. EM (DOE-OH and FFI) and LM will negotiate the most effective path forward for conversion by March 31, 2006 upon consideration of cost and schedule impacts.
Digitization of the AR is not included in the scope of the closure contract but is identified in the February 15, 2005, EM-1/LM-1 Terms and Conditions.	HIGH: Cost and schedule implications to perform these tasks have not been fully evaluated.	MITIGATION PLAN: <ol style="list-style-type: none"> EM (DOE-OH and FFI) will identify cost and schedule impacts of digitizing the AR. EM (DOE-OH) will include a planning assumption in the FY 2007 budget formulation. EM-CBC will assume responsibility for digitization of the AR if not completed by Physical Completion. EM (DOE-OH and FFI) and LM will work to accelerate digitization prior to FFI's declaration of physical completion.

Information and Records Management		
Risk Condition	Consequence	Risk-Handling Strategy
The ability of FFI to disposition records generated in projects completing on or near the March 31, 2006, Physical Completion date is uncertain.	HIGH: Because some records will be generated up until the point of Physical Completion, it is not reasonable to assume all will be dispositioned by the date of declaration. Failure to negotiate reasonable acceptance criteria could delay DOE's acceptance of Physical Completion.	MITIGATION PLAN: 1. EM (DOE-OH) and FFI will negotiate acceptable inventories of records that may be dispositioned in a reasonable timeframe post Physical Completion by March 31, 2005, via the CE/TP.
Finding aids may be insufficient to support the identification and retrieval of records in the future that may be required to support post-closure activities.	HIGH: Fernald records are managed using different programs and level of detail depending upon the area of record keeping. Some of the finding aids may not be at a level adequate to support easy identification and retrieval of records for new post-closure records managers.	MITIGATION PLAN: 1. LM and EM (DOE-OH and FFI) will initiate a cooperative effort to identify and document existing finding aids by March 15, 2005. 2. LM and EM (DOE-OH and FFI) will evaluate options for ensuring easy identification and retrieval ability while preventing additional requirements outside of the current closure contract scope by September 30, 2005.
Current agreements indicate EM responsibility for ongoing Energy Employee Occupational Illness Compensation Program Act (EEOICPA) claims; however, the EM-CBC is currently evaluating alternatives.	LOW: A change in the agreement of EM responsibility for ongoing EEOICPA claims will require additional record transfers to LM.	ACCEPT AND WATCH: Until such time that EM responsibility for ongoing EEOICPA claims is changed, no action is necessary.

2.8 Public Education, Outreach, Information, and Notice

Sites are required to develop and maintain a list of site stakeholders with associated address information, to provide updates of the ARs and on-site information repository available to interested parties, to develop the proper community involvement tools, and to estimate and fund adequate public involvement activities.

2.8.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH and FFI) is continuing public education and outreach with an active role from LM representatives.
- LM, in consultation with EM (DOE-OH and FFI), is determining future requirements for Internet websites, public information approaches, and content.
- LM, in consultation with EM (DOE-OH and FFI), is drafting a Community Involvement Plan.
- LM, in consultation with EM (DOE-OH and FFI), is preparing to initiate discussions with stakeholders on the development of the Local Stakeholder Organization (LSO) per legislative requirements.

2.8.2 Expected Conditions at Transition/Transfer

- LM, in consultation with EM (DOE-OH and FFI), will have completed the final Community Involvement Plan and provided to EM for inclusion as an attachment to Volume 1 of the LMICP.
- LM, in consultation with EM (DOE-OH and FFI), will have established the LSO for Fernald.

2.8.3 Major Actions, Lead Organization, and Schedule

- LM, in consultation with EM (DOE-OH and FFI), will begin public involvement activities for legacy management activities prior to September 1, 2004. **(COMPLETE)**
- EM (DOE-OH and FFI), in consultation with LM, will develop an estimate of expected post-closure costs associated with public involvement by March 31, 2005 (refer also to Section 2.6).
- LM, in consultation with EM (DOE-OH and FFI), will develop a Community Involvement Plan for inclusion in LMICP by June 30, 2005.
- LM, in consultation with EM (DOE-OH and FFI), will establish the LSO for Fernald by September 30, 2005.

2.8.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Public Education, Outreach, Information, and Notice		
Risk Condition	Consequence	Risk-Handling Strategy
The time necessary to establish the LSO as required by the National Defense Authorization Act for FY 2005 is uncertain.	LOW: New legislation requires establishment of the LSO 6 months prior to closure (i.e., September 30, 2005).	MITIGATION PLAN: 1. LM, in consultation with EM (DOE-OH and FFI), will begin discussions with stakeholders regarding establishment of the LSO in February 2005. (COMPLETE)

2.9 Natural, Cultural, and Historical Resource Management

Sites are required to implement appropriate systems or processes to protect sensitive cultural and natural resources, including threatened and endangered species and archeological and cultural resources. Sites are also required to protect sensitive information about the location and content of historic and prehistoric archaeological sites. The sites are required to identify locations and characteristics of natural and cultural resources needing LTS&M and to implement a corresponding management system as part of the LTS&M activities.

2.9.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH and FFI) has identified and documented one threatened and endangered species to be considered during post-closure activities, archeological/cultural resources, and site wetlands requiring post-closure management.
- EM (DOE-OH and FFI) is disclosing the location of artifacts and Native American burial sites on a need-to-know basis because of the sensitive nature of the records.

- EM (DOE-OH and FFI) has offered interment to federally recognized tribes, but the offer has not yet been pursued.

2.9.2 Expected Conditions at Transition/Transfer

- EM (DOE-OH and FFI) will have identified archaeological, cultural, and/or historical features on the site and developed plans for managing these resources with consideration of Native American burial site confidentiality issues.
- EM (DOE-OH and FFI) will have transferred existing archeological and cultural artifacts and site surveys to an acceptable, long-term archive location (e.g., Cincinnati Museum of Natural History).
- LM will have continued monitoring of the Fernald site cultural resources; preservation of sensitive and historical information, records, and photographs; and close interactions with federally recognized tribes upon operational acceptance of the site.
- LM will have continued monitoring of Fernald’s natural resources consistent with applicable agreements with regulators and natural resource trustees upon operational acceptance of the site.
- LM will continue to offer interment to federally recognized tribes.

2.9.3 Major Actions, Lead Organization, and Schedule

- EM (DOE-OH and FFI) will prepare a controlled document that contains information regarding the presence of sensitive locations and identifies how the artifacts and other materials were properly dispositioned by March 31, 2006.

2.9.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Natural, Cultural, and Historical Resource Management		
Risk Condition	Consequence	Risk-Handling Strategy
The timing at which federally recognized tribes may accept EM (DOE-OH)’s offer for interment on the Fernald site is uncertain.	LOW: EM resources may be inadequate to coordinate interment for federally recognized tribes concurrent with site closure activities should the interment offer be accepted between now and March 31, 2006.	ACCEPT AND WATCH: Until federally recognized tribes indicate the desire to pursue the offer of interment on the site, no resource support for coordination is necessary.

2.10 Business Closure Functions, Pension and Benefits, Contract Closeout or Transfer

Sites are required to identify current contractor pensions and benefits needs, identify the status of pending litigation and liabilities, identify restoration contract closeout actions, identify contracts/financial agreements required for LTS&M activities, and ensure requirements of DOE orders are satisfied.

2.10.1 Status and Approach at Signing of This Transition Plan

- EM (DOE-OH and FFI) is in negotiation regarding the accelerated delivery of a Contract Closeout Plan for Contract DE-AC24-01OH20115.

- EM-HQ initiated a study to satisfy Section 3122 of the National Defense Authorization Act for Fiscal Year of 2005, Maintenance of Retirement Benefits for Certain Workers for Fiscal Year at 2006 Closure Site.
- EM-CBC is in the process of standing up the organization and working with other EM organizations to identify its support responsibilities for pending litigation and liabilities and for contract termination actions.

2.10.2 Expected Conditions at Transition/Transfer

- EM (DOE-OH and FFI) will have transferred documents related to pension and medical plans to LM.
- EM-CBC will be fully operational and support responsibilities for Contractual/Financial Closeout support to closure sites will have been defined and transferred.
- EM-CBC will have retained responsibility for open worker compensation claims under the State Workers Compensation System, outstanding liability claims, and unresolved hourly grievances.
- LM will have assumed worker health-related claims for EEOICPA upon operational acceptance of the site.
- LM will have developed and implemented a Post-Closure Retiree Benefits delivery system.
- EM-HQ will have obtained Energy Systems Acquisition Advisory Board (ESAAB) approval of the CD-4 package, thereby representing project completion for the site and ability to transfer financial responsibility to LM.

2.10.3 Major Actions, Lead Organization, and Schedule

- EM-HQ, in consultation with EM (DOE-OH and FFI), will prepare a report on maintenance of contractor retiree benefits at the 2006 accelerated closure sites by January 28, 2005. **(COMPLETE)**
- LM, in consultation with EM (DOE-OH), will identify post-closure worker pension and benefits and ensure the means to continue service by May 1, 2005.
- EM-CBC will define its Contractual/Financial Closeout responsibilities to closure sites by *[To be determined following operational standup of the EM-CBC projected for June 2005]*.
- LM, in consultation with EM (DOE-OH), will develop a Post -Closure Retiree Benefits delivery system by March 31, 2006.
- EM-CBC-Cadre, in consultation with LM, will submit the Final CD-4 package for ESAAB approval by June 1, 2007 (identified as a major milestone in the Executive Summary).
- EM-HQ, in consultation with EM-CBC and LM, will prepare the formal memo proposing the transfer of programmatic responsibility and budget for LM concurrence by September 30, 2007.
- EM-CBC-Cadre, in consultation with LM, will submit a comprehensive Transition Lessons Learned document to EM and LM by September 30, 2007.

- EM (DOE-OH and FFI) will transfer responsibility for pensions and benefits to LM by October 1, 2007 (identified as a major milestone in the Executive Summary).

2.10.4 Key Uncertainties, Risk, and Risk Mitigation Strategies

Business Closure Functions, Pension and Benefits, Contract Closeout or Transfer		
Risk Condition	Consequence	Risk-Handling Strategy
The format, level of rigor required for documentation, and review time necessary to achieve ESAAB CD-4 package approval is uncertain.	HIGH: Transfer of responsibility to LM cannot occur until ESAAB CD-4 package approval has been received. Packages for the transfer of complex closure sites have not been completed to date.	MITIGATION PLAN: <ol style="list-style-type: none"> 1. EM (DOE-OH), in consultation with LM, will jointly develop draft CD-4 outlines for review and comment by EM-1 and LM-1 representatives in advance of submission to clarify expectations. 2. EM (DOE-OH), in consultation with LM, will conduct interim readiness reviews for inclusion in the CD-4 packages. 3. EM (DOE-OH), in consultation with LM, will complete the Preliminary CD-4 package by March 31, 2006, and the Final CD-4 package by June 1, 2007, to accommodate operational and financial responsibility transfer to LM.
The availability of a national contract for pensions and benefits management at physical completion is uncertain.	MEDIUM: The FFI contract allows for DOE direction regarding continued management of the pensions and benefits; however, costs for continued management are not currently identified in the FY 2007 budget.	MITIGATION PLAN: <ol style="list-style-type: none"> 1. FFI to identify options, the date at which decisions are needed to ensure continued management, and resource needs for each option in February 2005 to support FY 2007 budget formulation. 2. EM (DOE-OH) will review the alternatives and make a decision on the path forward by April 1, 2005.
Specific requirements of the Contractual/Financial Closeout process of the FFI contract have not been established by EM (DOE-OH).	MEDIUM: The current closure contract does not require FFI to deliver a Contract Closeout Plan until the time of Declaration of Physical Completion (currently planned for March 31, 2006). However, early identification of the activities is necessary to allow for definition of functions to be assumed by the EM-CBC.	MITIGATION PLAN: <ol style="list-style-type: none"> 1. EM (DOE-OH) and FFI mutually agree to accelerate delivery of the Contract Closeout Plan to approximately 6 months before closure.

3.0 Lessons Learned

The intent of the lessons-learned process is to provide effective information to assist existing and future projects undergoing the transition and project closeout process. The FCP Transition Team will identify and document pertinent information throughout the phases of transition and project closeout. Lessons learned that have been identified prior to financial transfer on October 1, 2007, will be included in the quarterly status reports to EM-1/LM-1. In addition, the EM-CBC-Cadre, in consultation with LM, will submit a comprehensive Transitions Lessons-Learned document to EM and LM by September 30, 2007.

4.0 Estimated Costs for Transition

The estimated costs for the transition of FCP during FY 2005 and FY 2006 are shown in Table 3 relative to the nine WBS elements and responsible organization. The Fernald site is scheduled to transition to LM on April 19, 2006. Costs to implement this plan may not be fully identified at this time (e.g., LM costs related to worker pension and benefits transition). It should also be noted that the Fernald site does not capture costs in the same WBS structure as the nine WBS elements listed below. In addition, the WBS elements below contain some duplication. Therefore, costs provided are estimates only.

Table 3. Estimated Costs for Transition

Site Transition Plan WBS Element	FY 2005 (\$000)			FY 2006 (\$000)		
	LM	EM	Total	LM	EM	Total
1. Program Management	131	21,436	21,567	125	8,783	8,908
2. Environmental	181	5,172	5,353	400	2,253	2,653
3. Records Management	89	1,492	1,581	235	738	973
4. Information Management	473	4,193	4,666	250	1,725	1,975
5. Property Management	22	1,709	1,731	20	484	504
6. Stakeholder and Regulator Relations	27	819	846	30	935	965
7. Worker Pension and Benefits	NA	32,462	32,462	NA	19,140	19,140
8. Procurement	20	1,489	1,509	25	474	499
9. Project Closeout	10	N/A*	10	10	N/A*	10
Total	953	68,772	69,725	1,095	34,532	35,627

NA – Not available

N/A* - Included in Element 1. - Program Management

The LM costs shown in Table 3 were prepared on the basis of information from the LM contractor, S.M. Stoller Corporation. The FY 2005 costs are the estimates at completion for contractual tasks and have been cross-walked to the nine WBS elements. The WBS 1.5, “Complete Project Closeout/Transition,” is presented according to the 10 functional areas cited in the STF (September 2004) and the *Site Transition Plan Guidance* (December 2004). The key assumptions used by LM and EM regarding funding for transition are described in Section 2.6 of this plan and in the *Terms and Conditions for Managing/Funding Site Transition Activities* (February 2005).

The EM costs shown in Table 3 were prepared on the basis of information from the EM prime contractor, Fluor Fernald Inc. The EM costs do not reflect Remediation cost or fee, only administrative and programmatic costs.

Table 4 provides the estimated projected operating costs for the following three activities: LTS&M, contract closeout, and pensions and benefits. Note that these operating costs are preliminary estimated. These costs have been developed for FY 2006 through FY 2007 and do not include any of the estimated costs presented in Table 3.

Table 4. Projected Operating Costs for LTS&M, Contract Closeout and Pensions and Benefits

Activity	FY 2006 (\$000)	FY 2007 (\$000)
LTS&M	6,648	11,055
Contract Closeout	7,945	7,496
Pensions and Benefits	10,207	18,832
Total	24,800	37,383

Table 5 represents the total of those costs identified in Table 3 and Table 4. The total cost is a good representation of anticipated transition and operating costs between FY 2005 and FY 2007.

Table 5. Total Estimated Costs for FY 2005 through FY 2007

	FY 2005 (\$000)	FY 2006 (\$000)	FY 2007 (\$000)
Total	69,725	60,427	37,383