



Transition Plan for the Mound Closure Project

March 2005



Mound Site Transition Plan

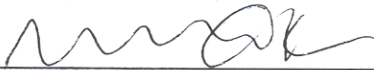
Rev. 0



March 2005

Signatories

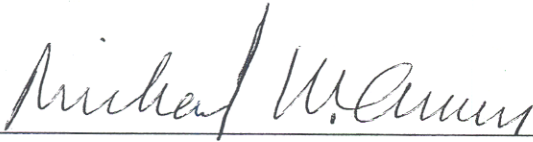
The following signatories on behalf of their respective organizations approve this plan.



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3/29/05

Date



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Executive Summary

The U.S. Department of Energy (DOE) Offices of Legacy Management (LM) and Environmental Management (EM) are planning and implementing the transfer of the Miamisburg Closure Project (MCP) for long-term surveillance and maintenance (LTS&M) and for certain legacy worker and contract liabilities to LM by the end of fiscal year (FY) 2006 (see Exhibit ES-1). The purpose of the Mound Site Transition Plan (STP) is to define the approach for the transfer from EM to LM, serve as the foundation for EM's implementation of Critical Decision-4 (CD-4), and prepare LM to manage the site post-closure in a manner that is protective of human health and the environment. The STP complies with the requirement for a "Disposition Plan" under DOE Order 430.1B, *Real Property and Asset Management*. The STP is a DOE management tool and is not an enforceable document under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or any other environment, safety, or health regulation.

Successful completion of the Mound Site Transition Plan will be achieved when the programmatic and financial responsibilities for the Miamisburg Closure Project are transferred from the Office of Environmental Management to the Office of Legacy Management in accordance with all U.S. Department of Energy requirements and in a manner that ensures uninterrupted protection of human health and the environment.

The primary goal of the MCP transition is the efficient closeout of EM site activities and the transfer of all long-term DOE responsibilities from EM to LM by FY 2006 year-end in a timely manner with no disruption of services and no negative effects on the successful completion of the cleanup and closure mission. To achieve this goal, DOE is managing the transition as a project. The MCP STP describes the scope, schedule, and cost for successful completion of the transition.

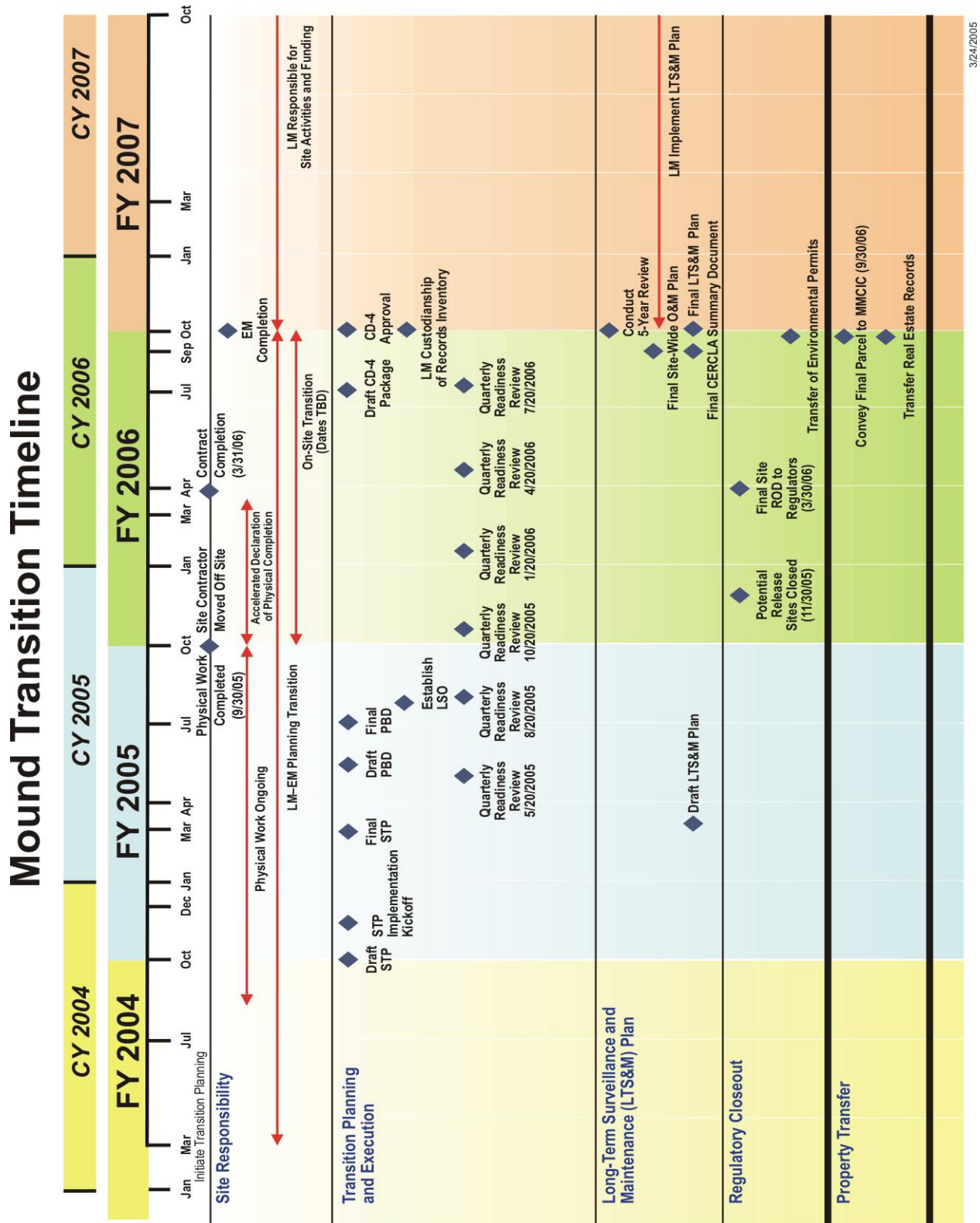
The scope of the transition is based on the activities required to meet LM's criteria for the acceptance of sites into its program, as defined in the Site Transition Framework (STF) (February 2005). To achieve the transfer date of September 30, 2006, the major transition activities and their lead organizations and schedules have been identified (see Chapter 2).

Key milestones are shown in Exhibit ES-2. The milestones will be reviewed and are subject to change.¹ EM and LM will provide configuration control for these milestones to ensure no changes will be made without due consideration of the effect on the baselines, including logistics impact, cost, schedule, and overall performance.

EM and LM have identified potential programmatic risks that might affect the scope and/or the schedule of the transition and could potentially delay the transition (see Chapter 2). Some of the potential programmatic risks that are of highest risk priority are listed in Exhibit ES-3. EM and LM are implementing mitigation actions to address these and other potential risks to site transition. Potential risks to achieving cleanup completion, their potential adverse effects on site closure, and the associated mitigation plans are described in the *MCP DOE Risk Reduction Plan* (September 2003, Rev. 4).

¹The milestone dates may change should any Requests for Equitable Adjustment or Baseline Change Control requests be approved.

Exhibit ES-1. Mound Transition Timeline



3/24/2005

Exhibit ES-2. Critical Milestones Under Configuration Control	
Milestone	Date^a
STP approved by Office of Environmental Management Assistant Secretary (EM-1) and Office of Legacy Management Director (LM-1)	3/31/05
Local Stakeholders Organization (LSO) established	7/31/05
EM issues Program Budget Document (PBD) to transfer FY07 budget authority to LM (including estimates for first 5 years of post-closure management.	8/1/05
Physical work completed	9/30/05
All Potential Release Sites (PRSs) are closed, per Core Team approval	11/30/05
DOE transmits draft Final Site Record of Decision (ROD) to regulators for approval	3/30/06
Contractor's Declaration of "physical completion"	3/30/06
LM receipt of final records inventory	9/30/06
DOE conveys final parcel to Miamisburg Mound Community Improvement Corporation (MMCIC)	9/30/06
CD-4 package approved by EM, LM, and DOE Office of Engineering and Construction Management (OECM)	9/30/06
LTS&M Plan signed by LM-1	10/1/06
LM accepts Mound site	10/1/06

^aThe milestones are based on the CH2M Hill Mound, Inc., closure contract as of February 2005. The milestone dates may change should any Requests for Equitable Adjustment or Baseline Change Control requests be approved.

Significant resources are required to conduct the transition activities described in this plan. EM and LM have estimated the costs for the transition of MCP during FYs 2005 and 2006 will total approximately \$1.121M and \$1.512M, respectively (see Chapter 3). These estimates will likely be revised as EM and LM continue to plan and execute the transition activities.

The major assumptions used in developing the transition schedule, scope, and cost are shown in Exhibit ES-4. These assumptions are based in part on the assumptions described in the *Terms and Conditions for Site Transition* (dated February 2005).

Turnover packages will be identified and developed by EM and the EM contractor. Each turnover package will contain a summary of present activities, a description of the current status, a summary of planned future activities and resource estimates, identification of milestones and commitments, critical issues, a list of applicable documents and procedures, and identification of project personnel and individuals who will interface with LM through transition completion.

Beginning in the third quarter of Fiscal Year (FY) 2005, EM and LM will conduct joint readiness reviews on a quarterly basis according to DOE Order 413.3, *Program and Project Management for the Acquisition of Capital Assets*, to ensure a successful and timely transition. The readiness reviews will assess site progress vis-à-vis the STF requirements. Review results will be communicated to EM and LM senior management during quarterly meetings.

Exhibit ES-3. Potential Programmatic Risks of Highest Priority	
Potential Risk^a	Mitigation Action
Program Management. Closeout of EM activities may be delayed if functions that were assumed able to be transferred to the EM Consolidated Business Center (CBC) are unable to be transferred or are unable to be transferred in a timely manner.	LM, EM, and the EM CBC will work together to ensure that a business closeout process is developed.
Environmental. There is a risk that unresolved cleanup issues could remain at the time of transfer of the site to LM (e.g., the Operable Unit 1 [OU-1] landfill continues to be an issue with the stakeholders and regulators).	LM and EM will work together to ensure that all cleanup issues are resolved prior to transfer. Pursuit of regulatory path forward on OU-1 landfill, and off-site areas.
Records Management. 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.	LM and EM will initiate a cooperative effort to document existing finding aids. Determination of mitigation actions required will be borne out by quarterly readiness reviews.
Information Management. There may be delays in the transfer (or insufficient transfer) of relational databases (e.g., Mound Environmental Information Management System [MEIMS]) deemed critical for post-closure because of lack of knowledgeable personnel, resources, etc.	Aggressively pursue accelerated transition of relational databases before site institutional knowledge is lost because of dwindling contractor personnel and resources.
Real Property Management. MMCIC may delay acceptance of one or more of the site parcels from DOE.	Aggressively pursue cooperative relationship with MMCIC to minimize likelihood of unexpected responses when DOE offers a parcel for conveyance.
Real Property Records. Significant resources may be required to support the upcoming real estate transactions, as well as to identify and inventory real estate records. However, there are limited personnel who are qualified to conduct real estate transactions for DOE EM and LM.	Solicit the support of qualified personnel from other sites (e.g., the Hanford Site) and identify lessons learned from other sites to develop more efficient processes. Identify outstanding actions in the first readiness review for real property.

^aOne or more potential risks have been identified for remaining Work Breakdown Structure (WBS) elements not specifically listed in Exhibit ES-2 (5. Stakeholder and Regulator Interface, 7. Worker Pension and Medical, 8. Procurement and 9. Project Closeout); however, they have not been identified as high priority.

LM will be ready to receive programmatic and financial responsibility for the MCP when the CD-4 package is approved and LM and EM have verified that all STF requirements have been met. Although every effort will be made to ensure that all transition activities described in this STP are completed by the time of transfer, it is possible that some EM transition activities may be implemented past the date at which the programmatic and financial transfers to LM occur. Those activities (if any) will be documented and funded by EM in the CD-4 package. In addition, it is anticipated there may be some activities and functions that will be transferred early. Such activities that are in the best interests of LM (e.g., those which retain institutional knowledge of

the site) will be assumed by LM provided they are transferred with accompanying EM funding for the duration of the early transition period.

Successful completion of this STP will be achieved when the programmatic and financial responsibilities for the MCP are transferred from EM to LM in accordance with all DOE requirements and in a manner that ensures uninterrupted protection of human health and the environment.

Exhibit ES-4. Major Transition Planning Assumptions

- The EM CBC will be available to assume identified responsibilities in support of site transition and post-closure beginning in FY 2005.
- The draft final Site-Wide ROD will be approved by the regulators prior to transfer of site custodianship to LM on September 30, 2006.
- The MMCIC will accept conveyance of all parcels designated for transfer prior to EM Completion.
- CD-4 package will be approved by FY 2006 year-end.
- Costs to implement this plan may not be fully realized at this time. Additional funding may be requested through the EM Change Control Board.
- The current contract DE-AC24-03OH-20152 includes DOE Order 430.1A, *Life Cycle Assessment Management*. A contract modification incorporating DOE Order 430.1B, *Real Property and Asset Management* is pending.
- The CH2M Hill closure contract as of March 2005 is not revised or amended. The milestone dates may change should any Requests for Equitable Adjustment or Baseline Change Control requests be approved.

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1.0 Introduction

1.1 Purpose

The purpose of the Mound Site Transition Plan (STP) is to define the project management life-cycle approach contained in U.S. Department of Energy (DOE) Order 413.3, *Program and Project Management for the Acquisition of Capital Assets*, to transfer the programmatic and financial responsibilities of the Miamisburg Closure Project (MCP) from the DOE Office of Environmental Management (EM) to the Office of Legacy Management (LM) by October 1, 2006. The Mound STP is a critical planning document that serves as the foundation for EM's implementation of Critical Decision-4 (CD-4) and for LM to be prepared to manage the site post-closure in a manner that is protective of human health and the environment. The STP is a DOE management tool and will not be an enforceable document under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or any other environment, safety, or health regulation.

1.2 Goals and Objectives

The goal of the STP is to provide a high-level tool to ensure successful closeout and transition of EM's responsibilities and to facilitate the transfer of the site to LM (and other organizations as appropriate [e.g., EM CBC]) for post-closure management. Within that larger goal, the STP is intended to achieve several specific objectives:

- Ensure efficient transfer of EM activities that remain after EM completion² to the EM Consolidated Business Center (CBC) or other appropriate organization.
- Provide requirements for, and support the preparation of, the EM CD-4 documentation for project closeout.
- Establish a common understanding of EM and LM financial, programmatic, and legal responsibilities throughout the transition period.
- Ensure that the requirements of the Site Transition Framework (STF) (February 2005) are met.

1.3 Requirements and Development Process

The EM CD-4 and site transition implementation approaches use a joint EM and LM team following a four-tiered, flow-down concept (see Exhibit 1-1). Appendix A of this document includes the list of requirements (or guidance) documents that MCP and LM used for preparation of this STP. The uppermost level involves the drivers, which provide a framework for the requirements associated with CD-4 and site transition activities. The primary drivers 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*. Adherence to revised DOE Order 430.1B is not yet a requirement in the Mound site closure contract but is being addressed in a pending contract amendment. Requirements have been further clarified in a variety of guidance documents, manuals, memoranda, and fact sheets.

²EM completion occurs when short-term response activities are complete, long-term response measures are established and determined operational and functional institutional controls are in place, and the necessary documentation is in place.

For closure sites, implementation of DOE Order 430.1B is achieved with development of a Disposition Plan. EM currently has a validated baseline (scope, schedule, and cost/budget) for activities required to achieve EM completion; therefore, disposition planning as required by DOE Order 430.1B is already complete for this portion of the activities. However, activities required from the point of EM completion up to the point of site transfer to LM have not been developed into a comprehensive project baseline. The STP, or level two of the flow-down concept in Exhibit 1-1, is intended to meet the DOE requirement for a Disposition Plan. The STP integrates the high-level requirements for scope, schedule, and cost/budget associated with EM completion, transition, and site transfer to LM. The STP contains four key elements:

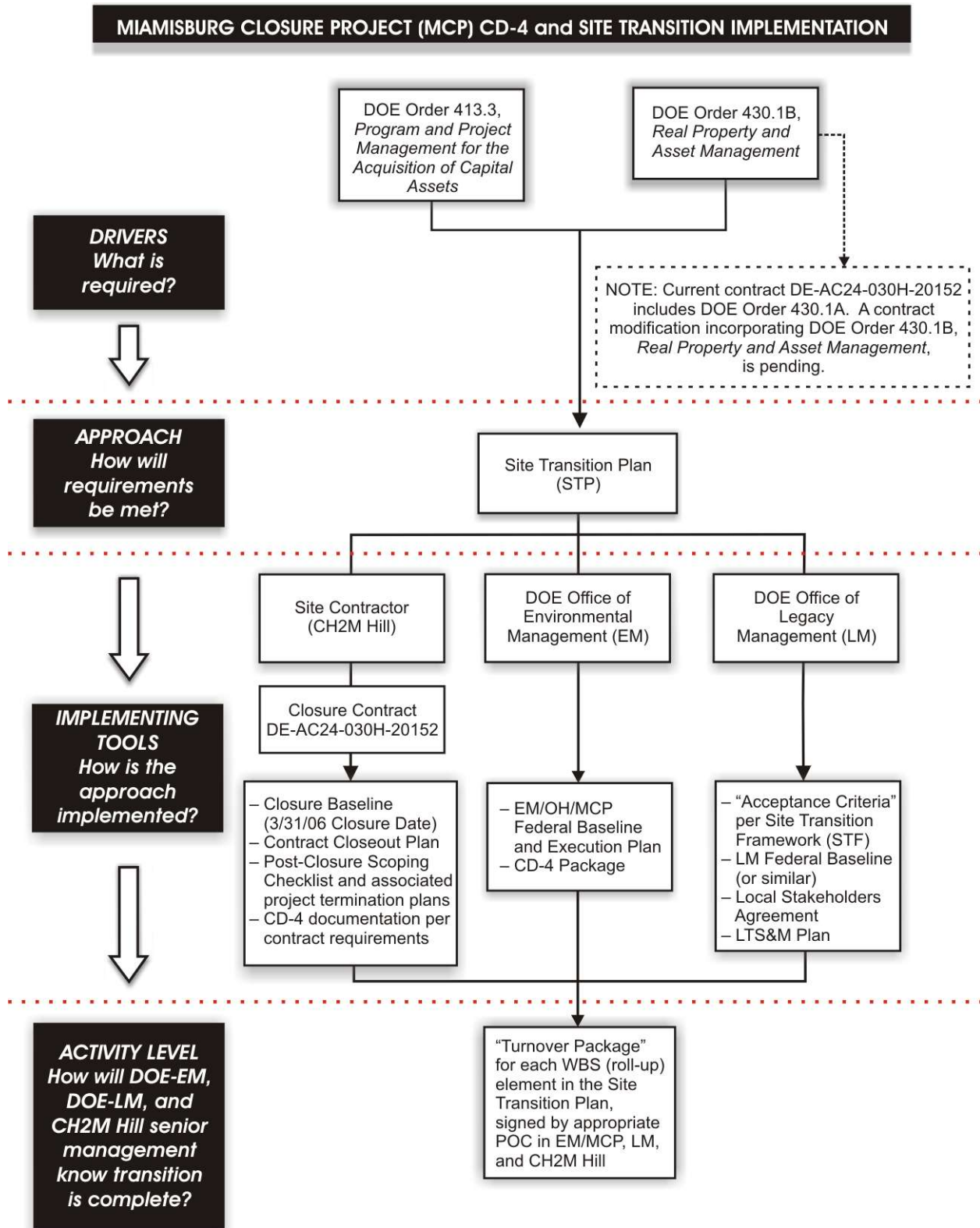
- Scope and schedule of transition activities focused around the 10 STF requirements that include: (a) Status and Approach at Signing of the Plan, (b) Expected Site Conditions at Transfer, (c) Key Assumptions for Site Transition, (d) Major Actions, Lead Organization, and Schedule; and (e) Risk and Risk Mitigation (Chapter 2).
- Transition project costs (Chapter 3).
- The methodologies to execute and manage the transition project, including configuration control of the milestones (Chapter 4).
- Detailed information regarding the process for closing out the transition project (Chapter 5).

Level three of the flow-down concept in Exhibit 1-1 involves the site-specific implementation tools for the three principal organizations: DOE-EM, DOE-LM, and the EM contractor. The EM contractor's activities are implemented via Closure Contract DE-AC24-03OH-20152. Existing deliverables under the contract will be used to satisfy STF requirements as appropriate. Specifically, the validated closure baseline, the contract closeout plan, post-closure scoping checklist and associated program termination plans, and CD-4 documentation will address portions of the STF and the CD-4 verification process. The EM activities are implemented using a resource-loaded Federal Baseline. Any additional activities identified during transition planning will be included in the Federal Baseline. The LM acceptance criteria identified in the STF and key activities, such as the establishment of a Local Stakeholders Organization (LSO) and the completion of the Long-Term Surveillance & Maintenance (LTS&M) Plan, will be documented in the LM Federal Baseline, or equivalent tool.

During implementation of the STP, the scope, schedule, and cost will be managed at the activity level using the following nine work breakdown structure (WBS) elements common to all three organizations:

1. Program Management
2. Environmental
3. Records Management
4. Information Management
5. Property Management
6. Stakeholder and Regulator Relations
7. Worker Pension and Benefits
8. Procurement
9. Project Closeout

Exhibit 1-1. Miamisburg Closure Project CD-4 and Site Transition Implementation Approach



Appendix B presents a crosswalk of the nine WBS elements to the 10 STF areas. Each WBS element will be subdivided into smaller turnover packages that will eventually be closed out, transferred to LM, or transferred to another part of EM (e.g., the EM CBC). EM will have the primary responsibility to develop the turnover packages, and LM will be responsible for developing the corresponding acceptance criteria from the STF requirements. The turnover packages represent the activity level, or lowest level of the flow-down concept in Exhibit 1-1, and document achievement of end-point criteria in accordance with LM's acceptance criteria. When the scope of each turnover package is completed and validated by LM, EM, and the EM contractor, a Certificate of Turnover Activity will be acknowledged by the signatures of the EM, LM, and EM contractor responsible managers.

Development of the draft STP included reviews by EM's Deputy Assistant Secretary for Environmental Cleanup and Acceleration and LM's Director of Policy and Site Transition. The signatures of the Office of Environmental Management Assistant Secretary (EM-1) and the Office of Legacy Management Director (LM-1) will indicate approval of the STP, Rev. 0.

1.4 Key Assumptions

Planning for the transition includes a number of assumptions. Many of these assumptions are based, in part, on crosscutting, and are related to the expected scope of the transition activities, the sources of funding, and the responsible organizations. These assumptions based in part on the assumptions described in the *Terms and Conditions for Site Transition* (dated February 2005). While all of the assumptions described in the *Terms and Conditions* are included in the STP, major assumptions include the following:

- EM and LM will conduct the site transition process in accordance with the applicable regulations and DOE Orders (mainly *DOE O.430.1B Real Property Asset Management* and *DOE O.413.3 Program and Project Management for Acquisition of Capital Assets*).
- EM and LM will jointly develop the site Transition Plan.
- The EM CBC will be available to assume identified responsibilities in support of site transition and post-closure beginning in Fiscal Year (FY) 2005.
- The draft final Site-Wide Record of Decision (ROD) will be approved by the regulators prior to transfer of site custodianship to LM on October 1, 2006.
- The Miamisburg Mound Community Improvement Corporation (MMCIC) accepts conveyance of all parcels designated for transfer prior to September 30, 2006.
- The milestones described in this plan are based on the CH2M Hill Mound, Inc., closure contract with a contract completion date of March 31, 2006. However, some milestone dates (e.g., baseline milestones, Federal Facility Agreement [FFA]-related milestones) may change should any Requests for Equitable Adjustment or Baseline Change Control requests be approved.
- CH2M Hill Mound, Inc. is assessing the need to relocate off the Mound site following physical work completion on September 30, 2005; any costs/tasks related to relocation are not included here.
- CD-4 package will be approved by FY 2006 year-end.
- Costs to implement this plan may not be fully realized at this time. Additional funding may be requested through the EM Change Control Board.
- The current contract DE-AC24-03OH-20152 includes DOE Order 430.1A, *Life Cycle Assessment Management*. A review will be conducted to determine the impact to the current contract of including DOE Order 430.1B, *Real Property and Asset Management*.

2.0 Project Scope and Schedule

This chapter provides descriptions of the scope and the schedule for the transition activities to achieve the 10 STF requirements that are used to verify that all appropriate steps have been or will be taken to close out the site and that actions by both the EM and LM organizations are identified to transfer the site to LM. For each STF element, the following information is presented:

- A brief description of the status and approach at the signing of this plan.
- A summary of expected site conditions at the time of transfer, which are based on the STF requirements.
- A list of EM and LM key site transition assumptions associated with transition and/or transfer, including the status of relevant site characteristics at the time the STP is submitted and the expected end state at the time of transfer.
- The list of key milestones that will be tracked by EM and LM, along with the expected milestone dates. A graphical representation of the milestone schedule is provided in Appendix D. The key milestones that are under configuration control are listed in Chapter 4.³
- A list of the major actions to be conducted by EM and LM during the transition project, along with the expected schedule and the organization responsible for each action.
- A table reflecting the results of an initial risk assessment performed by the Site Transition Team in FY 2004 to identify the priority (high, medium, or low) for each risk. The risk priorities are shown in the second column. EM and LM are jointly identifying more detailed mitigation strategies for each transition risk based upon the baseline date when each risk, if not resolved, will result in negative impact on the successful completion of the closure contract. The plans to address the potential risk items are briefly described in the third column of the table.

Chapter 3 presents the anticipated costs for these activities, by WBS element, and Chapter 4 includes the methodology to manage and execute the transition project. Chapter 5 presents the closeout process for the project.

2.1 Authorities and Accountabilities

2.1.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Authorities and Accountabilities” include, but are not limited to, the following:

- LM is identifying and initiating site transition protocols and actions to prepare for effective LTS&M management of the site.
- EM is managing the completion of cleanup and preparing the site for closure with the primary contractor CH2M Hill.
- A FFA focusing on remedial investigation, feasibility study, and remedy selection activities is in place.

³ It is important to note that the milestones described in this plan are based on the CH2M Hill Closure Contract as of March 2005. The milestone dates may change should any Requests for Equitable Adjustment or Baseline Change Control requests be approved.

2.1.2 Expected Site Conditions at Transfer

The end-state conditions for “Authorities and Accountabilities” include the following:

- Roles and responsibilities documents are approved and signed.
- Entities responsible for LTS&M are identified and funding sources and LM contract vehicles are identified and in place.
- Requirements and procedures are incorporated into the LTS&M Plan and agreements. Authorities for all DOE activities identified in the LTS&M Plan are consistent with the legal and/or DOE drivers for each activity (e.g., the Operations and Maintenance Plan [O&M] defines enforceable activities DOE must perform to maintain the CERCLA remedy).

2.1.3 Key Assumptions for Site Transition

The key assumptions for a successful transition regarding “Authorities and Accountabilities” include the following:

- Legal authority is well established under the National Oil and Hazardous Substances Pollution Contingency Plan, CERCLA, and the Superfund Amendments and Reauthorization Act that DOE has authority to conduct O&M of the CERCLA remedy. LM’s LTS&M Plan (a non-enforceable document) will summarize DOE’s O&M requirements (outlined in enforceable, regulator-approved O&M Plans for each CERCLA remedy).
- Roles and responsibilities for LM’s post-closure activities will be defined in the LTS&M Plan (see Section 2.6 for more information regarding the LTS&M Plan).
- DOE (EM/LM) and the regulators will reach consensus regarding the need for a tri-party agreement for post-closure activities. The potential alternatives include: no change to the current FFA, amendment of the FFA, creation of a new post-closure tri-party agreement to replace the FFA (FFA would be terminated), or termination of the FFA with no new agreement.
- MMCIC will accept conveyance of all parcels designated for transfer, prior to September 30, 2006.
- The current contract DE-AC24-03OH-20152 includes DOE Order 430.1A, *Life Cycle Assessment Management*. A review will be conducted to determine the impact to the current contract of including DOE Order 430.1B, *Real Property and Asset Management*.
- The EM and LM Site Manager, in coordination with the LM Site Transition Coordinator and the EM Site Transition Coordinator, will submit a quarterly progress report on transition activities to EM-1 and LM-1 starting in April 2005.

2.1.4 Major Actions, Lead Organization, and Schedule

Listed below are the key milestones for “Authorities and Accountabilities” transition activities.

Key Milestones	
Milestone	Date
Receive comments on the Draft STP from EM and LM senior management	Complete
STP submitted to EM and LM senior management for signatures	3/1/05
Final STP approved by EM-1 and LM-1	4/1/05
EM/LM perform the first in a series of quarterly readiness reviews of the transition project	4/30/05
EM completion	9/30/06
LM accepts Mound site	10/1/06

The major actions necessary to meet the STF requirements for “Authorities and Accountabilities” and the responsible organizations are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
Develop STP, including the draft and final STP, to prepare for transition of responsibility for MCP from EM to LM	EM/LM	2/28/05
Closeout or transfer of existing site permits and agreements	EM	9/30/06
Implement revised/new tri-party agreement (FFA) (as applicable)	LM/EM	9/30/06

2.1.5 Risk and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
Closeout of EM activities may be delayed if functions that were assumed to be able to be transferred to the EM CBC are unable to be transferred or are unable to be transferred in a timely manner.	High	LM and EM must work together to ensure a business closeout process is developed.
LM may not have contractual mechanisms in place soon enough to support key activities (e.g., maintaining the groundwater monitoring system, operating the pump and treat) during the period between “physical completion” (3/30/06) and turnover to LM (9/30/06).	Low	EM may consider having contractual mechanisms in place (e.g., through Richland) or LM may provide contingency support.

2.2 Site Conditions

2.2.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Site Conditions” include, but are not limited to, the following:

- The majority of the site condition documents have been developed (e.g., RODs) and include the required information. EM will prepare a “Final Site-Wide CERCLA Summary” document that includes a summary of risks, findings, and conclusions from the CERCLA cleanup process.
- Groundwater wells required for groundwater monitoring will be transferred to LM; EM will abandon inactive wells. Some air-monitoring stations may remain following cleanup for National Emission Standards for Hazardous Air Pollutants purposes; air monitors may not be necessary post-EM completion if the CERCLA remedy does not require air monitoring.
- The 1998 Sales Contract between DOE and MMCIC contains the metes and bounds of the 306-acre former DOE Mound Plant site, as described in a property survey performed in 1982. A survey for each parcel is recorded with Montgomery County upon execution of the quit claim deed conveying parcel ownership to MMCIC.
- The General Purpose Lease for buildings DOE has leased to MMCIC expires September 8, 2009, with one 5-year option. Individual building leases are terminated when the parcel in which the building lies is deeded to MMCIC.
- Four parcels (i.e., D, H, 4, and 3) have been transferred to MMCIC (see Appendix C). A fifth parcel (Phase I) ROD has been approved and U.S. Environmental Protection Agency (EPA) has approved transfer of the property to MMCIC; however, DOE has yet to offer the parcel to MMCIC for conveyance.
- Parcels D, H, and 4 have been delisted from the National Priorities List (NPL). Parcel 3 is still in the process of delisting.

2.2.2 Expected Site Conditions at Transfer

The end-state conditions for “Site Conditions” include, but are not limited to, the following:

- The site at closure (remedies and hazards) is adequately described.
- Conceptual site model(s) for each CERCLA remedy is(are) documented in an appropriate CERCLA document.
- EM short-term response activities are complete; long-term response actions (e.g., groundwater pump and treat) are established and determined as operational and functional; institutional controls (ICs) are in place; and the necessary CERCLA documentation is in place.
- All remaining buildings will meet free-release criteria.
- Natural Resources Damage Assessment (NRDA) claims, documents, and liabilities are identified and being resolved by EM.
- Off-site investigations will not result in remediation activities that will impact the site completion schedule or will require long-term response actions post-closure.

2.2.3 Key Assumptions for Site Transition

Key assumptions for a successful transition regarding “Site Conditions” include the following:

- The Draft Final Site-Wide ROD will be approved by regulators prior to EM’s transfer of site responsibility to LM on October 1, 2006.
- EM will prepare a Final Site-Wide CERCLA Summary document that includes a summary of risks, findings, and conclusions from the CERCLA cleanup process by September 30, 2006.

- EM will also prepare a Final Site-Wide O&M Plan that consolidates all remedy-specific, enforceable O&M requirements currently in place or envisioned for parcels not yet conveyed by September 30, 2006.
- There are no NRDA claims that impact cost beyond EM completion. On the basis of DOE/Ohio EPA discussions, both parties agree (but not yet in writing) that DOE has no NRDA liability at the Mound site. DOE Ohio Field Office (DOE-OFO) Counsel is currently negotiating settlement of Fernald’s NRDA claim with the U.S. Department of Justice and State of Ohio attorneys. DOE-OFO’s plan is to include in the Fernald settlement a “covenant not to sue” for the claim filed by the State of Ohio against the Mound site.
- Long-term response actions for groundwater treatment will continue beyond EM completion and DOE site closure.
- National Environmental Policy Act of 1969 (NEPA) documentation necessary for site transfer (if any) will have been completed by EM site completion.
- All known Potential Release Sites (PRSs) will have been dispositioned per the Mound 2000 process and closed out by the Core Team prior to site closure.
- No significant changes to the soils, buildings, and groundwater closure strategies are required.
- Nevada Test Site and Envirocare will remain open to receive waste.
- If unforeseen contamination is discovered in soils or buildings, it will not significantly affect the schedule.
- Site-wide or remedy-specific conceptual site models will be captured in the Risk-Based End-State (RBES) Vision.

2.2.4 Major Actions, Lead Organization, and Schedule

The key milestones for “Site Conditions” activities are listed in the table below.

Key Milestones	
Milestone	Date
Last building demolished or transfer closed out by Core Team	9/30/05
Physical work completed	9/30/05
Last soil PRS closed by Core Team	11/30/05
All PRSs closed	11/30/05
Declaration of “physical completion”	3/30/06

The major actions necessary to meet the “Site Conditions” requirements and the responsible organizations are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
Close all PRSs	EM	11/30/05
Transfer CERCLA Administrative Record to LM	EM	3/30/06
Confirm that all remedial actions are complete, all short-term response actions are closed out, all long-term response actions are operating properly and successfully, and have clear performance and exit criteria	EM	9/30/06

Major Actions and Responsibilities		
Action	Organization	Date
Resolve NRDA issues or transfer responsibility for addressing NRDA issues to EM CBC	EM	9/30/06

2.2.5 Risk and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
There is a risk that unresolved cleanup issues could remain at the time of transfer of the site to LM (e.g., the Operable Unit-1 (OU-1) sanitary landfill continues to be an issue with the stakeholders and regulators).	High	LM and EM must work together to ensure that all cleanup issues are resolved prior to transfer. Pursuit of a regulatory path forward on OU-1 landfill, canal ROD, and off-site impacted areas is needed.
If seeps continue to show tritium (or volatile organic compounds) above the maximum contamination levels (MCLs), the regulators may want an active remedy (e.g., digging plus access controls), as opposed to the current practice of monitoring the seeps.	Medium	Ensure effective source-term removal, where applicable.
There may be a delay in obtaining an approved Final Site-Wide ROD before September 30, 2006. This could happen, for example, if DOE accepts completion of the EM contractor contract, but the Draft Final ROD is not ready for signature.	Low	This delay would likely not cause a delay in transfer as long as EM continues to maintain responsibility (i.e., full-time equivalents, budget) for only that aspect (i.e., Parcel 8 ROD, Environmental Summary, and U.S. EPA approval to transfer the parcel) of the MCP.

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

2.3.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning” include, but are not limited to, the following:

- Engineered controls are identified in the appropriate CERCLA regulatory documents, including the RODs and associated O&M Plans.
- O&M activities are documented in the appropriate O&M Plans. DOE-EM will provide LM with a regulator-approved Final Site-Wide O&M Plan that documents the CERCLA remedies (administrative and technical) identified in each ROD. At a minimum, O&M requirements will include site-wide ICs, groundwater monitoring on the Phase I parcel, and

groundwater collection and treatment in OU-1. The ROD for the Miami-Erie Canal (OU-4) is a “No Action” ROD.

The evaluation of “off-site” areas (i.e., potentially impacted areas outside the 306-area boundary of the original DOE Mound Plant [site]) is currently underway. Should that evaluation show off-site areas have been impacted, a remedy will need to be defined (that remedy may, or may not, be No Action). Accordingly, at present, it appears that LM will have no O&M requirements for areas other than the 306 acres of the original DOE Mound Plant Site.

- First 5-year review of all CERCLA remedies was performed in FY 2001. U.S. EPA concurred on all protectiveness statements in DOE’s 5-year review report.
- The next CERCLA 5-year review is scheduled for FY 2006.

2.3.2 Expected Site Conditions at Transfer

The end-state conditions for “Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning” include, but are not limited to, the following:

- Engineered controls are identified and documented.
- Life-cycle estimate for O&M costs is prepared.
- Master schedule of ongoing activities is prepared.
- RBES is documented in RBES Vision.
- CERCLA O&M activities are identified and funded, and parties have been selected to perform necessary activities.
- Emergency/contingency planning and authorities are identified and any necessary agreements (e.g., Memorandum of Agreement) are in place.

2.3.3 Key Assumptions for Site Transition

The key assumptions for a successful transition regarding “Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning” include, but are not limited to, the following:

- If there are significant remedy failures (which are not expected) that require modification of the remedies outside the capabilities of LM, such remedies will be coordinated with EM and included in EM’s remediation budget. EM and LM will raise the issue to the Under Secretary for resolution.
- Off-site remedial risk calculations will conclude that no further off-site (i.e., beyond 306-acre Mound site) remediation is required.
- The OU-1 pump-and-treat system may be required to operate for the full 30 years envisioned in the 1995 ROD. O&M requirements for the remedy defined in the 1995 ROD (i.e., pump & treat) are defined in a regulator-approved O&M Plan. If additional OU-1 remedies are necessary to affect property transfer (e.g., implementation of ICs preventing direct access) those O&M requirements will be rolled into the Final Site-Wide O&M Plan. If OU-1 requires further remedial action beyond the current pump-and-treat system, the remedy will be fully implemented, and operating properly and successfully prior to EM completion.
- The monitored natural attenuation (MNA) remedy for trichloroethylene in the Phase I parcel will be operational and functional.
- All soils above acceptable risk range will have been excavated and shipped off site, and the tritium source term in the bedrock aquifer will be removed prior to site closure.
- The draft final Site-Wide ROD will be approved by the regulators prior to transfer of site custodianship to LM on October 1, 2006.

2.3.4 Major Actions, Lead Organization, and Schedule

The key milestones for “Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning” activities are listed in the table below.

Key Milestones	
Milestone	Date
Off-Site Residual Risk Assessment completed	9/30/06
Final Site-Wide O&M Plan completed	9/30/06
Final Site-Wide CERCLA Summary Report completed	9/30/06

The major actions necessary to meet the “Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning” requirements and the responsible organizations are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
Develop and provide a validated life-cycle baseline through 2070, at a minimum (75 years), and supporting basis of cost estimates for post-closure management	EM	3/31/05
Complete the Off-Site Residual Risk Assessment	EM	9/30/06
Final Site-Wide O&M Plan complete	EM	9/30/06
Final Site-Wide CERCLA Summary Report complete	EM	9/30/06

2.3.5 Risk and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
None	N/A	N/A

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

2.4.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Institutional Controls, Real and Personal Property, and Enforcement Authorities” include, but are not limited to, the following:

- Three ICs are identified in all parcel RODs completed to date (and envisioned in the future): (1) land use remains industrial/commercial, (2) unauthorized use of groundwater is prohibited, and (3) unauthorized removal of soil from the boundaries of the 360-acre Mound Plant site is prohibited. The O&M Plan for ICs is updated each time a parcel completes the CERCLA 120(h) process.

- The 1995 ROD for OU-1 contains a “no dig” restriction, and OU-1-specific ICs will be implemented prior to property transfer.
- Consistent with the site-wide IC for industrial/commercial use, LM would also have to monitor property development across the entire 306-acre site.
- The O&M Plan for ICs requires an annual assessment of the ICs. DOE may petition the regulators to decrease the frequency of the review (e.g., to coincide with the 5-year review).
- The parcel RODs and the parcel quit claim deeds provide DOE, U.S. EPA, and the Ohio EPA with a perpetual easement to access the property for the purpose of maintenance and enforcement of the CERCLA remedy.
- The Phase I parcel remedy (MNA) groundwater monitoring plan requires an annual assessment of activities conducted pursuant to the plan to confirm the effectiveness of the MNA remedy.

2.4.2 Expected Site Conditions at Transfer

The end-state conditions for “Institutional Controls, Real and Personal Property, and Enforcement Authorities” include, but are not limited to, the following:

- Land use/ICs are identified, approved, appropriately recorded, and implemented.
- Real property records are complete.
- Personal property transfers are complete.
- The existing Mound Emergency Response Plan will be sufficient for post-closure; no additional procedures or systems will need to be developed.

2.4.3 Key Assumptions for Site Transition

The key assumptions for a successful transition regarding “Institutional Controls, Real and Personal Property, and Enforcement Authorities” include the following:

- All groundwater monitoring wells that are not required for post-closure monitoring will be decommissioned and sealed (i.e., abandoned) per regulatory requirements prior to EM completion.
- Any residual contamination left on site will be at levels acceptable for industrial use.
- All the real property at MCP planned for transfer to MMCIC will be transferred prior to LM accepting responsibility for the site. Only 9 of the 116 original DOE buildings are expected to remain at EM completion. EM will develop and provide: real property records, including access agreements for off-site wells or land parcels required for LTS&M.
- Overhead utility structures and components will be removed prior to site closure. Sewer and water lines will have been abandoned in place or transitioned to MMCIC.
- All land-use controls (e.g., easements) not related to monitoring and surveillance of the CERCLA remedy will be removed or eliminated prior to EM completion.
- Access controls (e.g., fencing and signage) that are required for any of the remedies will be formally incorporated into regulatory decision documents, approved by the regulators, and implemented in the field by EM prior to transition.
- Deed restrictions will be in effect across the entire site: (1) maintenance of industrial/commercial land use, (2) prohibition against the use of groundwater, and (3) prohibition against the removal of soils from the boundary of the 306 acres owned by DOE.
- DOE to have access to any property necessary for operating and maintaining the LTS&M requirements.
- Real property records will be inventoried, dispositioned, and transferred to LM as required by DOE Order 430.1B.

- CH2M Hill Mound, Inc. will relocate off the Mound site following physical work completion on September 30, 2005.
- EM will initiate the documentation to transfer real property from EM to LM and coordinate the finalization with LM and ME.

2.4.4 Major Actions, Lead Organization, and Schedule

The key milestones for “Institutional Controls, Real and Personal Property, and Enforcement Authorities” activities are listed in the table below.

Key Milestones	
Milestone	Date
Water/sewer system connection to City of Miamisburg	4/4/05
All aboveground utilities demolished per EM contractor contract	6/30/05
DOE conveys final parcel to MMCIC	9/30/06
EM will validate that parcel deeds (which include the CERCLA 120[h] environmental summary) are recorded with Montgomery County	9/30/06

The major actions necessary to meet the STF requirements for “Institutional Controls, Real and Personal Property, and Enforcement Authorities” and the responsible organizations are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
Convert potable water system to City of Miamisburg-supplied water and turnover sanitary sewer to MMIC/City of Miamisburg	EM	4/4/05
Demolish all aboveground utilities per CH2M Hill contract	EM	6/30/05
EM contractor transitions storm water management responsibility to EM	EM	3/31/06
Transfer real property to MMCIC, as parcels become available, according to the site sales contract. Verify that MMCIC records each parcel quit claim deed (including the CERCLA 120[h] Environmental Summary for that parcel) with Montgomery County.	EM	9/30/06
Identify inventory of current building lease agreements with MMCIC and terminate leases upon parcel conveyance.	EM	9/30/06
Identify, collect, consolidate, and inventory real property records, such as acquisition, transfer, outgrant, ingrant, facility, and other records	EM	9/30/06
Legally close out, revise/amend, and generate new agreements (e.g., easements, licenses) and real estate mechanisms, as necessary, for post-closure	EM	9/30/06
Transfer real property records, including access agreements for off-site wells or land parcels required for O&M of the CERCLA remedy to LM	EM	9/30/06

2.4.5 Risk and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
MMCIC may delay acceptance of one or more of the site parcels from DOE. Federal Property Officer resources are limited and changes to previous deeds or execution of new deeds and easements may not occur prior to 9/30/06.	High	Aggressively pursue cooperative relationship with MMCIC to minimize likelihood of unexpected responses when DOE offers a parcel for conveyance.
Significant resources may be required to support the upcoming real estate transactions, as well as to identify and inventory real estate records. However, there are limited personnel who are qualified to conduct real estate transactions for DOE EM and LM.	High	Solicit the support of qualified personnel from other sites (e.g., the Hanford Site) and identify lessons learned from other sites to develop more efficient processes.
The requirements of the existing EM closure contracts may not adequately address the need to preserve real estate records required for post-closure.	Medium	EM Contracting Officer proactively identifies & communicates real property records needs/requirements for post-closure to EM contractor.

2.5 Regulatory Requirements and Authorities

2.5.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Regulatory Requirements and Authorities” include, but are not limited to, the following:

- The Mound 2000 Work Plan identifies the cleanup approach the site is using under CERCLA. The Mound 2000 Work Plan is a primary document (enforceable) under the FFA.
- RODs have been issued for Parcels D, H, 4, and 3 and Phase I.
- Verification of compliance for the implemented remedy and O&M activities being conducted in accordance with regulator-approved O&M Plans.
- FFA is in place for remedial investigation, feasibility study, and remedy selection activities.
- Current permits on site include Resource Conservation and Recovery Act (RCRA), NPDES, Clean Air Act and CERCLA Authorization Discharge (ATD) for the effluent from the OU-1 plump & treat system.

2.5.2 Expected Site Conditions at Transfer

The end-state conditions for “Regulatory Requirements and Authorities” include, but are not limited to, the following:

- All regulatory decision documents are identified and complete. RODs and Environmental Summary documents are complete and approved by regulators for all parcels.
- The implemented remedy is operational and functional and O&M Plans are in place.
- CERCLA 5-year review(s) or other regulatory review results are available.
- Site Treatment Plan Order by Ohio EPA terminated prior to site closure.
- DOE supports U.S. EPA in delisting the Mound site from the NPL.
- RCRA and Clean Air Act permits terminated prior to site closure.

- Document locations are identified and documents are accessible to DOE-EM and DOE-LM.
- Any off-site impacts will be identified and addressed, sufficient to obtain regulatory approval.
- NPDES Permit terminated prior to closure, unless Clean Water Act requirements (e.g., NPDES Storm Water Permit) remain because DOE has not conveyed the final parcel by 9/30/06.

2.5.3 Key Assumptions for Site Transition

The key assumptions for a successful transition regarding “Regulatory Requirements and Authorities” include the following:

- The regulators will approve all RODs and other documentation required for property transfer under CERCLA 120(h).
- The LTS&M Plan will present summaries of all CERCLA requirements relating to O&M of CERCLA remedy post-closure. O&M requirements will have been previously approved by the regulators in the Final Site-Wide O&M Plan prepared by DOE-EM.
- EM and LM will jointly perform the next-scheduled 5-year review of all CERCLA remedies. That review is currently scheduled for completion no later than FY 2006 year-end.

2.5.4 Major Actions, Lead Organization, and Schedule

The key milestones for “Regulatory Requirements and Authorities” activities are listed below.

Key Milestones	
Milestone	Date
Acquire DOE ROD acceptance for Parcel 6	8/30/05
Acquire DOE ROD acceptance for Parcel 7	10/18/05
Acquire DOE ROD acceptance for Parcel 8	2/23/06
DOE transmits draft Final Site ROD to regulators for approval	3/30/06
Terminate streamlined RCRA permit	9/30/06
LTS&M Plan approval by LM-1	10/1/06

The major actions necessary to meet the STF requirements for “Regulatory Requirements and Authorities” and the responsible organization are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
EM contractor transitions storm water management responsibility to EM	EM	3/31/06
Develop LTS&M Plan with support from EM	LM	9/30/06
Closeout or transfer of existing site permits and agreements	EM	9/30/06
Acquire ROD approvals for all remaining parcels	EM	9/30/06
Complete Draft Final Site-Wide ROD	EM	9/30/06
Support NPL delisting of site parcels (306 acres plus Miami-Erie Canal) by U.S. EPA	EM	9/30/06

2.5.5 Risk and Risk Mitigation

Potential Programmatic Risks		
Potential Risk	Risk Priority	Mitigation Action
A moderate level of uncertainty exists as to the commitment and ability of the regulators to support the delivery of the CERCLA documents per EM contractor's baseline loading.	Medium	EM and the Ohio Field Office are instituting significant management tracking and performance metrics to ensure that the Government Furnished Services (GFS/I) is delivered as expected.

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

2.6.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Long-Term Surveillance and Maintenance Budget, Funding, and Personnel” include, but are not limited to, the following:

- In January 2003, EM published the Mound Plant Long-Term Stewardship (LTS) Plan in accordance with EM-1 memorandum (dtd 8/29/02) titled “Long-Term Stewardship Planning Guidance for Closure Sites.” The LTS Plan is a non-enforceable document that EM developed with regulator and stakeholder input. The LTS Plan will not be updated by EM as a condition of EM completion or DOE site closure.
- LM initiated development of the LTS&M Plan that will serve as LM's technical baseline for post-closure management of the MCP. The LTS&M Plan will include components of the LTS Plan published by EM in January 2003.
- The EM CBC will be available to assume identified responsibilities in support of site transition and post-closure, including providing support for EM's business closeout process, beginning in 2005.
- In April 2004, EM developed a detailed post-closure budget for maintenance of the CERCLA remedy, records management, and employee pension and benefits program. LM participated in this exercise and independently developed its own post-closure budget. A consolidated post-closure budget has been developed and will be updated during the quarterly readiness reviews.

2.6.2 Expected Site Conditions at Transfer

The end-state conditions for “Long-Term Surveillance and Maintenance Budget, Funding, and Personnel” include, but are not limited to, the following:

- Technical and cost baselines for LTS&M are developed.
- Available funding is consistent with baseline and estimates.
- Personnel requirements are identified.
- An EM business closeout process is developed.

2.6.3 Key Assumptions for Site Transition

The key assumptions for a successful transition regarding “Long-Term Surveillance and Maintenance Budget, Funding, and Personnel” include the following:

- The budget responsibility for MCP lies with EM until the beginning of the fiscal year following EM completion. EM will budget for and support any activities for which LM takes responsibility prior to the start of the fiscal year. EM will develop and provide a validated baseline and supporting basis of cost estimates for the first five years of post-closure management, two years prior to the planned date of transfer. This baseline will be the basis for the 5-year funds transfer in the PBD.
- Funding for and management of the following activities will be the responsibility of EM until they are completed:
 - ♦ EM is responsible for NRDA settlements until two years after the programmatic transfer of the site. (Future NRDA claims based on failure to maintain the remedy are LM's responsibility);
 - ♦ Litigation regarding EM cleanup; or other EM activity;
 - ♦ Closeout of all contracts associated with cleanup and closure of the site; and
 - ♦ Records of Decision and other regulatory drivers.
- EM will provide funding to LM for any unfunded mandates, such as financial assistance to states that are not included in the first 3 years of the validated technical and cost baseline. This includes, but is not limited to, funding for any remedy modification (e.g., installation of additional monitor wells) for areas of the NPL site that do not have completed RODs or equivalents).
- EM and LM will work together to develop planning documents and estimates for the management of post-closure activities at the Mound site. EM and LM will develop and implement a process for resolving differences in estimates.
- EM will digitize the CERCLA Administrative Record.
- MCP's life-cycle budget update (April 2004) for post-closure costs contains a reasonable cost estimate developed by EM and LM for LM's records management requirements, unless one or more DOE records management risk items (see below) result in premature loss of EM closure contractor site-specific knowledge (e.g., contractor personnel with extensive knowledge of CERCLA program and/or records inventories).
- MCP's life-cycle budget update (April 2004) for post-closure costs contains a reasonable cost estimate developed by EM and LM for CERCLA remedy-maintenance requirements, unless one or more DOE environmental risk items (see below) result in an end-state condition that is different from the DOE Federal Baseline (e.g., seeps require active remediation, sanitary landfill in OU-1 requires exhumation).
- EM will budget and provide qualified resources to manage federal and EM contractor records inventories and information technology (IT) systems in accordance with all Federal, National Archives and Records Administration (NARA), and DOE orders (Draft DOE Order 243.X, *Records Management Program*; DOE Order 200.1, *Information Management Program*; Title 36 *Code of Federal Regulations* [CFR]; and 44 *United States Code* [U.S.C.]) through programmatic transfer to LM.
- EM will continue to fund contractor pension plans to satisfy all applicable requirements. LM will assume budget responsibility for site activities and contractor pensions and benefits in the fiscal year following EM completion.
- Congressional appropriations for EM and LM remain at sufficient levels to implement a successful site closure and transfer.

2.6.4 Major Actions, Lead Organization, and Schedule

The key milestones for "Long-Term Surveillance and Maintenance Budget, Funding, and Personnel" activities are listed in the table below.

Key Milestones	
Milestone	Date
EM submits Program Budget Document (PBD) to transfer site budget authority	6/30/05

The major actions necessary to meet the STF requirements for “Long-Term Surveillance and Maintenance Budget, Funding, and Personnel” are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
Prepare budget requests and include all post-closure work scope in out-year target until a PBD is signed and out year funding is formally transferred	EM	Dates follow President’s budget cycle
Prepare and submit budget requests as required, beginning with the request for FY 2007, which is the first year that LM will have budget responsibility	LM	Dates follow President’s budget cycle
Prepare the PBD, to be concurred on by LM	EM	6/30/05
Develop technical and cost baselines for LTS&M	LM	6/30/05

2.6.5 Risk and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
None	N/A	N/A

2.7 Information and Records Management

2.7.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Information and Records Management” include, but are not limited to, the following:

- EM is currently dispositioning inactive records and shipping them to storage at local Federal Records Centers.
- EM dispositioned all classified records that were previously located at the site to new custodians (e.g., DOE laboratories, National Nuclear Security Administration sites).
- There are approximately 40 IT applications, and 10 applications that have been selected for transfer to LM.

2.7.2 Expected Site Conditions at Transfer

The end-state conditions for “Information and Records Management” include, but are not limited to, the following:

- Information and records are dispositioned, as appropriate
- Information and records planning is acceptable to stakeholders.

2.7.3 Key Assumptions for Site Transition

The key assumptions for a successful transition regarding “Information and Records Management” include the following:

- Custody of EM records will be transferred to LM with the exception of those records required for: LTS&M activities, contract closeout, on-going litigation, Freedom of Information Act (FOIA)/Privacy Act (PA) requests, and Energy Employees Occupational Illness Compensation Program Act (EEOICPA) claims.
- EM will plan and provide qualified resources to manage federal and contractor record inventories in accordance with all regulations.
- EM or EM CBC will retain records related to ongoing EEOICPA claims, and EM will complete processing of ongoing claims.
- LM will have full access to all site databases required for post-closure prior to site transfer so that the resources can be effectively and efficiently transferred to LM.
- EM will update data in the IT systems required for post-closure to reflect cleanup completion.
- All IT systems that are not required for post-closure will be retired and dispositioned by EM, as appropriate.
- Provide electronic conversion of environmental and record data for post-closure management and support services in accordance with the specifications and conditions defined by LM.
- Provide consultation services by IT and data subject management experts to assist LM in understanding the operation, maintenance, data structures and contents, and systems configuration requirements for the applications necessary to conduct stewardship activities.
- Provide exports of databases and program source code for Information Systems being migrated to LM for stewardship operations and services.
- All classified records have been dispositioned.

2.7.4 Major Actions, Lead Organization, and Schedule

The key milestones for “Information and Records Management” activities are listed in the table below.

Key Milestones	
Milestone	Date
Complete disposition of inactive records	10/30/05
Identify active records required for EM contractor contract closeout	10/30/05
Complete transfer of early decision Mound IT applications	9/30/06
Complete transfer of all remaining applicable Mound IT applications	9/30/06
Complete transfer of responsibility for custodianship of all appropriate MCP records to LM, including the CERCLA Administrative Record	9/30/06
Complete disposition of records managed by DOE	9/30/06
Receive and process last updated data for all Mound IT applications	9/30/06

The major actions necessary to meet the STF requirements for “Information and Records Management” and the responsible organizations are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
Define the electronic records and IT systems that are needed for post-closure management of the site, including those applications that are early-decision applications	LM	12/30/04
Define the records, data, and format (electronic and hard copies) that are needed for post-closure management of the site	LM	12/31/04
Develop an Information and Records Management Transition Plan (IRMTP) to organize records/information transfer tasks; establish a timetable and milestones for their completion; and identify personnel, funding, and other resources that will be needed to complete the ownership transfer in accordance with the <i>Legacy Management Information and Records Management Transition Guidance</i> (March 2004)	EM/LM	12/31/04
Disposition inactive records according to regulatory requirements (e.g., NARA requirements)	EM	9/30/05
Prepare plan to address remaining active records (e.g., identify active records and disposition accordingly; transfer to LM)	EM	10/30/05
EM will digitize the CERCLA Administrative Record	EM	3/31/06
Disposition electronic records (e.g., to Federal Record Centers) if not required to support post-closure	EM	3/31/06
Prepare early-decision IT applications for migration and transfer to LM, along with user and system documentation	EM	9/30/06
Provide, when requested by EM during site transition, records management services for frequently accessed, short-term records that are agreed to be transferred prior to physical site transition. EM will reimburse LM for these services.	LM	9/30/06
Prepare the remaining IT applications for migration and transfer to LM, along with user and system documentation	EM	9/30/06
Transfer handling of ongoing EEOICPA requests to EM CBC	EM	9/30/06
Ensure that agreements are in place to disposition continuing EM records, prior to actual site transfer, that do not transfer to LM (e.g. current contract close-out records, ongoing litigation and FOIA/Privacy Act requests) and disposition the records, as appropriate.	EM	9/30/06
Transfer responsibility for future newly generated EEOICPA requests to LM.	EM	9/30/06
Complete custody transfer of all MCP inactive records, including records stored at Federal Record Centers	EM	9/30/06

Major Actions and Responsibilities		
Action	Organization	Date
Transfer to LM all IT system/application licenses that are required to meet LM mission objectives.	EM	9/30/06
Provide renewals of all IT system/application licenses that are required to meet LM mission objectives.	LM	9/30/06
Compile, prepare, and turn over the final inventory of MCP records (including any special record collections); finding aids; all Standard Form (SF)-135s, SF-258s, and SF-115s; and documentation for future records retrieval by LM	EM	9/30/06
Transfer the CERCLA Administrative Record to LM	EM	9/30/06
Establish local public reading room(s) for post-closure	LM	9/30/06

2.7.5 Risk and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
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	Initiate a cooperative effort between LM and EM to identify/document existing finding aids. Determination of mitigation actions required will be borne out by assessment.
EM may not inventory, archive, or disposition all of its records prior to transfer of the site because of lack of knowledgeable personnel, resources, etc.	Medium	Determine resources required to disposition records in accordance with NARA guidance prior to transfer of the site.
There may be delays in the transfer (or insufficient transfer) of relational databases (e.g., MEIMS) deemed critical for post-closure because of lack of knowledgeable personnel, resources, etc.	High	Aggressively pursue accelerated transition of relational databases before site institutional knowledge is lost because of dwindling contractor personnel and resources.

2.8 Public Education, Outreach, Information, and Notice

2.8.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Public Education, Outreach, Information, and Notice” include, but are not limited to, the following:

- There is a formalized communication plan through CERCLA. A draft *Community Involvement Plan* has been developed for the transition period itself and post-transfer.
- The Mound Reading Room provides public access to copies of the documents in the CERCLA Administrative Record and other environmental documents.

- LM representatives have been actively participating in public meetings and have provided presentations to stakeholder groups.

2.8.2 Expected Site Conditions at Transfer

The end-state conditions for “Public Education, Outreach, Information, and Notice” include, but are not limited to, the following:

- A list of stakeholders has been developed and is up-to-date.
- An updated CERCLA Administrative Record is available to interested parties.
- Communication mechanisms are in place to continue relevant and meaningful stakeholder relations.
- Public involvement costs are estimated and funded.

2.8.3 Key Assumptions for Site Transition

The key assumptions for a successful transition regarding “Public Education, Outreach, Information, and Notice” include the following:

- LM and EM will use existing communication activities (e.g., meetings) to inform stakeholders and regulators regarding the transition progress.
- The *Community Involvement Plan* for post-closure will be in place.

2.8.4 Major Actions, Lead Organization, and Schedule

The key milestones for “Public Education, Outreach, Information, and Notice” activities are listed in the table below.

Key Milestones	
Milestone	Date
LSO established	7/31/05
Complete <i>Community Involvement Plan</i> for site transition	9/30/06

The major actions necessary to meet the STF requirements for “Public Education, Outreach, Information, and Notice” and the responsible organizations are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
Develop relationships with stakeholders and regulators and participate, as appropriate, in regular status meetings to inform public regarding transition status	LM	Ongoing
Develop <i>Community Involvement Plan</i> for site transition and include post-closure components in LTS&M Plan	LM	9/30/06
Prepare and ensure that the CERCLA Administrative Record is available to the public post-closure	LM	9/30/06

2.8.5 Risk and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
LSO Agreement may not be signed prior to transfer.	Medium	Although an important milestone, this is not likely to affect transfer as the current FFA meets the needs of EM for EM completion. LM will proactively pursue (with EM participation/cooperation) development and implementation of the Post-Closure LSO Agreement.

2.9 Natural, Cultural, and Historical Resource Management Requirements

2.9.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Natural, Cultural, and Historical Resource Management Requirements” include, but are not limited to, the following:

- There are no threatened or endangered species or critical habitats at the former DOE Mound Plant.
- There are no cultural resources as determined by the Ohio Historic Preservation Office and other subject matter experts.
- The majority of the 17 buildings were/will be demolished by DOE-EM during the course of environmental restoration at the MCP site. Of the two historically significant buildings (T and GH) that will remain in place post-EM completion, no restrictions will be in place for those buildings (e.g., property owner does not need permission of State Historic Preservation Office to modify or even demolish GH or T Buildings). The only “restrictions” that apply to these two buildings are the same restrictions that apply to any existing or newly-constructed building at the industrial park – land use within the 306-acre footprint of the original DOE Mound Plant shall be limited to Industrial/Commercial.
- The quit claim deed for each parcel conveyed includes restrictions and covenants to run with the land, and which are binding upon the Grantee (i.e., MMCIC) and its successors, transferees, etc., for the benefit of the Grantor (i.e., DOE), US EPA and the State of Ohio. The three “site-wide” covenants that run with the land (i.e., the CERCLA remedy in the form of ICs) are summarized elsewhere in this STP. For further details on those ICs, refer to each parcel's quit claim deed.

2.9.2 Expected Site Conditions at Transfer

The end-state conditions for “Natural, Cultural, and Historical Resource Management Requirements” include, but are not limited to, the following:

- A system is in place to protect sensitive information.
- There are no natural, cultural, or historic resources at the Mound site requiring federal protection post-closure

2.9.3 Key Assumptions for Site Transition

On the basis of the current condition of this particular STF requirement (see Section 2.9.1), it does not appear that the current site conditions will change (i.e., there are no natural, cultural, or historic resources at Mound requiring federal protection); therefore, no key assumptions for site transition are necessary.

2.9.4 Major Actions, Lead Organization, and Schedule

There are no key milestones for “Natural, Cultural, and Historical Resource Management Requirements.”

The major actions necessary to meet the STF requirements for “Natural, Cultural, and Historical Resource Management Requirements” and the responsible organizations are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
EM provides LM all records pertaining to natural, cultural, and historic resource identification and management activities.	EM	3/31/06
Incorporate any natural, cultural and historical resource requirements into the LTS&M Plan	LM	9/30/06

2.9.5 Risk and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
None	N/A	N/A

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

2.10.1 Status and Approach at Signing of this Plan

The current status of site characteristics that are relevant to “Business Closure Functions, Pension and Benefits, Contract Closeout or Transfer, and Other Administrative Requirements” include, but are not limited to, the following:

- An audit performed in 2003 regarding funding support for pension and health benefits (including worker’s compensation and life insurance) resulted in an estimate of approximately \$417 million (constant FY 2003 dollars) for the period 2003-2070.
- Aon Consulting conducted an exhaustive actuarial analysis for LM to estimate post-closure benefits liability for 2006-2010.
- Employee attrition (both CH2M Hill and EM) is continuing during the transition period. Both EM contractor and CH2M Hill workforce reductions are planned for 2005.
- A National Stewardship Contractor (NSC) will be procured. The NSC will be capable of handling all post-closure employee benefits including but not limited to pension, medical,

displaced worker medical, Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA), life insurance.

- As per *Terms and Conditions Memorandum* (dated 2/15/05), the EM CBC will assume open Worker's Compensation Claims under the State Worker's Compensation system.

2.10.2 Expected Site Conditions at Transfer

The end-state conditions for "Business Closure Functions, Pension and Benefits, Contract Closeout or Transfer, and Other Administrative Requirements" include, but are not limited to, the following:

- Responsibilities for administration and funding of employee claims and benefits are identified and planned.
- Current contractor pensions and benefits (including displaced worker medical benefits) are identified and planned.
- Status of pending litigation and liabilities are identified.
- Contract closeout actions for closure of the EM contractor contract are identified.
- Determination is made regarding continuation of the Career Transition Center.
- DOE requirements are satisfied.

2.10.3 Key Assumptions for Site Transfer

The key assumptions for a successful transition regarding "Business Closure Functions, Pension and Benefits, Contract Closeout or Transfer, and Other Administrative Requirements" include the following:

- Until EM/LM reach agreement on the cost estimate for pensions and benefits and apply it to the budget process, EM will retain responsibility for worker compensation and for administering employee benefits, including worker pension and health benefits as well as 3161 benefits.
- EEOICPA support (records) will be transferred from EM to LM.
- EM will be responsible for conducting and completing workforce transition as required by 3161.
- The existing CERCLA cost-recovery grant to the State of Ohio will be terminated or transferred prior to EM Completion; post-closure will not require significant resources (e.g., grant funding) for regulatory oversight.
- Cleanup contracts will be terminated and closed out by EM.
- The EM CBC will handle contract closeout activities (e.g., Babcock Wilcox Technologies of Ohio, EG&G, Monsanto).
- LM contracts will be in place in time to conduct the required LTS&M during post-closure.
- EM's existing closure contract will be used as the mechanism to administer and pay pensions and other post-retirement benefits until LM can put a new contract vehicle in place.
- For contracts and/or grants that are transferring to LM, EM will provide copies of all procurement documents to LM and work with LM to identify points of contact in the recipient organizations.
- CD-4 approval will take place in FY 2006.
- The EM CBC will be available to assume identified responsibilities in support of site transition and post-closure beginning in FY 2005.
- Costs to implement this plan may not be fully realized at this time. Additional funding may be requested through the EM Change Control Board.

- This STP will be completed and terminated at site closure. Any remaining EM actions will be included in the CD-4 package. LM's actions, required post-closure, will be in the LTS&M Plan.
- EM will prepare the formal transfer memo proposing the transfer of programmatic responsibility and budget for LM concurrence.
- EM will provide funding to LM for any unfunded activities (e.g., an EM post-closure regulatory decision) that result from EM decisions. This includes, but is not limited to, funding for any remedy modification (e.g., installation of additional monitoring wells) if a final ROD or equivalent is not in place. Funds transfer will be limited to the period covered by the PBD.

2.10.4 Major Actions, Lead Organization, and Schedule

The key milestones for “Business Closure Functions, Pension and Benefits, Contract Closeout or Transfer, and Other Administrative Requirements” activities are listed in the table below.

Key Milestones	
Milestone	Date
Termination of existing cost recovery grant to the State of Ohio	9/30/06
Prepare for disbursement of the cost-recovery grant (if any) to the State of Ohio for post-closure	9/30/06
LM contract(s) in place to conduct post-closure activities	9/30/06
Termination of existing cleanup contract (EM contractor contract)	9/30/06
CD-4 package approved	9/30/06
Post-Closure Benefits delivery system completed	10/1/06
Transfer of worker pension and benefit responsibilities completed	10/1/06
Complete preparation for addressing worker health-related claims	10/1/06

The major actions necessary to meet the STF requirements for “Business Closure Functions, Pension and Benefits, Contract Closeout or Transfer, and Other Administrative Requirements” and the responsible organizations are listed in the table below.

Major Actions and Responsibilities		
Action	Organization	Date
Submit a quarterly progress report on transition activities to EM-1 and LM-1 (beginning calendar year 2005)	EM/LM	Quarterly
Resolve Stepp case and other legal issues (if any) or transfer responsibility to EM CBC	EM	9/30/06
Administer and close out Workforce Transition Program	EM	9/30/06
Prepare to address worker health-related claims	EM CBC	9/30/06
Prepare to address liability policy claims	EM	9/30/06
Prepare to address unresolved hourly employee claims (Outstanding items will be handled by the contract closeout team and most likely will not be turned over to LM.)	EM	9/30/06

Major Actions and Responsibilities		
Action	Organization	Date
Develop and implement a Post-Closure Retiree Benefits delivery system.	LM	9/30/06
Close out and terminate existing CERCLA cost-recovery grant to the State of Ohio	EM	9/30/06
Identify and prepare to provide new cost-recovery grant for post-closure oversight by State of Ohio	LM	9/30/06
Procure services, using contracts and subcontracts as needed, to conduct post-closure activities at the site	LM	9/30/06
Manage and terminate existing cleanup contract (EM contractor contract)	EM	9/30/06
Conduct the readiness reviews of EM's draft CD-4 package and provide input from the reviews to EM for inclusion in the final CD-4 package	LM	9/30/06
Prepare the CD-4 package with support from LM	EM	9/30/06
Review and approve the CD-4 package	OECM	9/30/06
Develop a lessons-learned document	EM	9/30/06
Administer and close out Employee Benefits Program	EM	10/1/06
Administer and transfer Retiree Benefits and Pension Fund Program to LM	EM	10/1/06
Transfer administration of Tuition Refund Plan for active employees & 3161 Tuition Refund Plan for Cold War Worker	EM	10/1/06

2.10.5 Risks and Risk Mitigation

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
The EM contractor is required by contract to manage and administer the legacy medical and pension plans until EM completion. During a recent actuarial and legal evaluation, CH2M Hill estimated that an additional \$19.9M might be required (life cycle) beyond what is currently included in the contract because of poor performance of the stock market. As specified in the contract, the EM contractor only has partial responsibility for any shortfall up to EM completion, the extent of which depends upon whether the EM contractor meets the completion deadline of March 2006. In the past, if a shortfall occurred, it was	Medium	Pursue supplementary funding for legacy medical and pension cost growth

Potential Risks		
Potential Risk	Risk Priority	Mitigation Action
typically addressed by shifting funds from the cleanup appropriation. If this occurs, the transition schedule would likely be adversely affected.		
The CD-4 closeout package may not be approved by the OECM by September 30, 2006.	Low	Work cooperatively with EM to ensure that CD-4 package is complete, is on time, and meets requirements.

3.0 Project Cost

The estimated costs for the transition of MCP during FY 2005 and FY 2006 are shown in Exhibit 3-1 relative to the nine WBS elements. The estimated costs for some elements are grouped together due to current cost-estimating methodologies. However, it is important to note that not all transition costs have been estimated as of the date of this plan (e.g., LM costs related to worker pension and benefits transition). Updates will be included in any revisions made to the STP.

Site Transition Plan WBS Element	FY 2005 (\$000)			FY 2006 (\$000)		
	LM	EM	Total	LM	EM	Total
1. Program Management	280	48	328	342	48	390
2. Environmental	210	60	270	210	60	270
3. Records Management	95	43	138	449	43	492
4. Information Management	150	14	164	125	14	139
5. Property Management	36	28	64	36	28	64
6. Stakeholder and Regulator Relations	60	56	116	60	56	116
7. Worker Pension and Benefits	0	11	11	0	11	11
8. Procurement	0	19	19	0	19	19
9. Project Closeout	0	11	11	0	11	11
Total	831	290	1,121	1,222	290	1,512

^aNot all transition costs have been identified as of the date of this plan. And, any early transition activities that will be assumed by LM will be transferred with accompanying EM funding for the duration of the early transition period.

The LM costs shown in Exhibit 3-1 are based on the costs estimated by the LM contractor, S.M. Stoller Corporation. These costs were originally estimated by the contractual tasks and have been crosswalked to the nine WBS elements. The EM costs are based on the *MCP Functional Analysis*, dated April 2004, and the *Ohio Field Office (OFO) Federal Baseline to Closure*, dated September 23, 2004. In both documents, the WBS 1.5, "Complete Project Closeout/Transition," is presented according to the 10 functional areas cited in the STF (February 2005) and the *Site Transition Plan Guidance* (February 2005). These costs were then cross-walked to the nine WBS elements, assuming an equal distribution of costs across the corresponding WBS elements (as referenced in Section 1.3). The key assumptions used by LM and EM regarding funding for transition are described in Section 2.6.3 of this plan and in the *Terms and Conditions for Site Transition* (February 2005).

The costs in Exhibit 3-1 do not include post-closure costs that will be borne by LM (e.g., costs to maintain the CERCLA remedy, to maintain Federal records, to administer employee pension and benefits program). Such costs (beginning FY 2007) were budgeted during EM's life-cycle budget update cycle in April 2004, based on an estimate developed by EM and LM. The post closure (FY 2007 and out years) budget is summarized in LM's LTS&M Plan.

4.0 Project Execution and Control

This chapter describes the execution and control of the transition project.

4.1 Project Execution

4.1.1 Implementation

Because both LM and EM developed this STP, both Offices share responsibility for STP implementation. LM and EM have committed to work together in a teaming arrangement to successfully execute this plan. Effective communication is the key to successful transfer of responsibilities for the Mound site. The Site Transition Team, which is composed of EM, LM, and the EM contractor, will meet quarterly to conduct readiness reviews in accordance with DOE Order 413.3. The purpose of the readiness reviews is to assess transition progress against the requirements in the STF. Team members are committed to open communication and sharing of information through regular face-to-face meetings, e-mails and other correspondence, and conference calls.

Regular communication with all stakeholders is critical to success. EM and LM developed a *Community Involvement Plan* for the Mound site to ensure effective communications between all organizations involved in the transition process. LM is committed to engaging the regulators and stakeholders (e.g., MMCIC and the City of Miamisburg) early in the process and developing good working relationships to facilitate cooperation and problem resolution in the event that issues arise post-transition.

4.1.2 Progress Evaluation and Reporting

The status of the transition project progress, including potential risks and their risk mitigation plans, will be provided to LM and EM senior management on a regular basis. The progress of the transition project will be assessed, evaluated, and reported to EM and LM senior management on a quarterly basis. The Site Transition Team will use a Milestone Schedule to document, track, and report progress against all critical transition activities. If completion of an activity (or milestone) is overdue, a narrative explaining the variance will be documented, and the impacts of the schedule delay will be assessed. If corrective action(s) is(are) warranted, it will be documented in the schedule and tracked thereafter until completion.

4.2 Project Control

4.2.1 Configuration Control

EM and LM will provide configuration control for selected milestones. Configuration control ensures that no changes to the milestones are implemented without due consideration of the effect of that change on the baselines, including cost, schedule, scope, logistics impact, and actual performance. Exhibit 4-1 presents the key milestones for which EM and LM will provide configuration control.

Exhibit 4-1. Milestones Under Configuration Control	
Milestone	Date^a
STP approved by EM-1 and LM-1	3/31/05
LSO established	7/31/05
EM issues PBD to transfer FY 2007 site budget authority to LM	8/1/05
Physical work completed	9/30/05
All PRSs are closed, per Core Team approval	11/30/05
DOE transmits Draft Final Site ROD to regulators for approval	3/30/06
Declaration of “physical completion”	3/30/06
LM receipt of final records inventory	9/30/06
DOE conveys final parcel to MMCIC	9/30/06
CD-4 package approved by EM, LM, and OEMC	9/30/06
LTS&M Plan signed by LM-1	10/1/06
LM accepts Mound site	10/1/06

^aThe milestones are based on the CH2M Hill Mound, Inc., closure contract as of February 2005. The milestone dates may change should any Requests for Equitable Adjustment or Baseline Change Control requests be approved.

EM and LM will continually monitor the progress of the transition activities to identify if any changes may adversely affect successful completion of one or more of the milestones. If such changes are identified, EM and the LM Site Transition Coordinator will work together to determine how to ensure that the milestone(s) will be met. However, if it appears that the milestone(s) will likely not be met, the EM Project Director and the LM Site Transition Coordinator will document in a letter to LM-1 and EM-1 a description of the potential change to the milestone(s), a brief assessment of the possible impacts, and a description of the mitigating actions that will be taken. Changes to the milestones will be discussed during the Transition Team’s quarterly updates to DOE Headquarters.

5.0 Project Closeout

This chapter provides additional information regarding the process to close out the transition project.

5.1 Turnover Packages

The objective for preparing turnover packages is to successfully document preparation for the transition of the Mound site to LM and to support closeout of the CH2M Hill Prime Contract DOE Number DE-AC24-03OH-20152. Turnover packages will be identified and developed by EM and the EM contractor for each WBS element, if needed, identified in Section 1.3. Each turnover package will contain a summary of present activities, a description of the current status, a summary of planned future activities and resource estimates, identification of milestones and commitments, critical issues,⁴ a list of applicable documents and procedures, and identification of project personnel and individuals who will interface with LM through transition completion. EM and LM will review these turnover packages prior to completion. LM will develop criteria for each turnover package that will be used to validate completion of the turnover package.

When the transfer of a turnover package or a critical issue deliverable from EM to LM is completed, a Certificate of Turnover Activity will be acknowledged by the MCP Transition Project Manager, LM representative, and the EM contractor representative for each business element. Copies of signed certificates will be provided to EM, LM, and the EM contractor. Appendix E is a sample outline of a turnover package.

5.2 CD-4 Approval/Termination of the Site Transition Plan

The STP is considered to be complete (i.e., all actions complete) when EM's CD-4 package has been approved by OECM and LM has taken over programmatic and financial responsibilities of the Mound site, which will occur at the beginning of the fiscal year after CD-4 approval. Although every effort will be made to ensure that all transition activities are completed by the time of transfer, it is possible that some EM transition activities may be implemented past the date of the programmatic and financial transfers to LM. Those continuing EM activities will be documented in the CD-4 package. In addition, it is anticipated there may be some activities and functions that will be transferred early. Such activities that are in the best interests of LM (e.g., that which retain institutional knowledge of the site) will be assumed by LM provided they are transferred with accompanying EM funding for the duration of the early transition period. The interim verifications of readiness for transfer, performed each quarter by the Site Transition Team, will be documented in the turnover packages.

⁴Critical issues are issues that LM will want to verify, review, accept, or assign during the transition period and issues that impact LM's ability to successfully assume responsibility on the scheduled transfer date or may impact transition activities within the first 3 months of operations.

5.3 Lessons Learned

A transition lessons-learned document will be developed and documented by the EM Site Manager throughout the execution of this project. It is the intent of the Site Transition Team to document meaningful lessons learned so that other transition projects can benefit from the MCP site transition activities. Prior to each readiness review, any new lessons learned since the previous readiness review will be added to the lessons-learned document. Lessons learned during the preparation of the turnover packages also will be included. The lessons-learned document will be organized by WBS element and serve as an important reference document to ensure continuous improvement in the project management process. The lessons-learned document will be finalized in the closeout phase of the transition project e.g., the EM Site Manager will submit a final comprehensive Transition Lessons Learned document for the site to EM and LM.

Appendix A

List of Requirements (or Guidance) Documents for Site Transition Plan

- DOE Guide 430.1-5, *Transition Implementation Guide*, dated April 2001.
- DOE Manual 413.3-1, *Project Management for the Acquisition of Capital Assets*, dated March 31, 2003.
- Draft DOE Order 243.X, *Records Management Program*.
- DOE Order 200.1, *Information Management Program*.
- DOE National FOCUS Project Fact Sheet, *Definition of EM Completion and DOE Site Closure*, dated January 2003.
- DOE National FOCUS Project Fact Sheet, *EM Completion: Implementing the Critical Decision 4 Process*, dated April 2004.
- EM-1 Memorandum, *Transition of Long-Term Response Action Management Requirements*, dated June 2003.
- EM Memorandum, *EM Federal Baseline Development Policy*, dated October 2003.
- EM/LM Fact Sheet, *Site Transition Process Upon Cleanup Completion*, dated April 2004.
- LM *Site Transition Framework* dated February 2005.
- *Terms and Conditions for Site Transition*, dated February 2005.
- EM/LM Fact Sheet, *Site Transition Plan Guidance*, dated December 2004 (Final).
- Title 36 *Code of Federal Regulations*.
- 44 *United States Code*.

Appendix B

Crosswalk of the 10 Site Transition Framework (STF) Requirements to the 9 Mound Site Transition Plan Implementation Work Breakdown Structure (WBS) Elements

	Work Breakdown Structure (WBS) Elements								
	1	2	3	4	5	6	7	8	9
	Program Management	Environmental	Records Management	Information Management	Property Management	Stakeholder and Regulator Relations	Worker Pension and Benefits	Procurement	Project Close-Out
Site Transition Framework Requirements (September 2004)									
I Authorities and Accountabilities									
A - Roles and responsibilities documents approved and signed.	●	●	●	●	●	●	●		
B - Entities responsible for long-term surveillance and maintenance (LTS&M) identified; funding sources identified.	●	●				●			
C - Requirements and procedures incorporate into LTS&M Plan and agreements.	●	●				●			
D - Legal authority for LTS&M identified.		●				●			
II Site Conditions									
A - The site at closure (remedies and hazards) has been described.		●			●	●			
B - Conceptual site model for LTS&M has been completed.		●				●			
C - All remedial action and documentation has been completed.		●				●			
D - Natural Resource Damage Assessment (NRDA) claims and documents have been identified.		●							
Engineered Controls, Operations and Maintenance Requirements, and Emergency/Contingency Planning									
A - Engineered controls have been identified and documented.		●				●			
B - Life-cycle estimate prepared.	●	●	●	●	●	●	●	●	
C - Master schedule of ongoing activities prepared.	●	●	●	●	●	●	●	●	●
D - Risk-based end state identified.		●				●			
E - Operation and maintenance (O&M) activities identified, funded, and performing party selected.	●	●				●		●	
F - Emergency/contingency planning and authority identified.		●				●			
Institutional Controls, Real and Personal Property, and Enforcement									
IV Authorities									
A - Land use/institutional controls identified, approved and implemented.		●			●	●		●	
B - Property records are complete.		●	●	●	●	●			
C - Personal property transfers are completed.		●	●	●	●	●			
V Regulatory Requirements and Authorities									
A - Regulatory decision documents are identified and complete.		●				●			
B - Implemented remedy and LTS&M activities are in compliance.		●				●			
C - CERCLA 5-year review or other review results are available.		●				●			
D - NPL status, RCRA permit status, or state requirements are known.		●				●			
E - NRC license status is established.	Not Applicable								
F - Document location has been identified and documents are accessible.		●	●	●		●			
VI Long-Term Surveillance and Maintenance Budget, Funding, and Personnel									
A - Technical baseline for LTS&M has been developed.	●	●	●	●	●	●	●	●	
B - Available funding is consistent with baseline and estimates.	●							●	
C - Personnel requirements are identified.	●	●	●	●	●	●	●	●	
D - A business closeout process has been developed.	●	●	●	●	●	●	●	●	●
VII Information and Records Management									
A - Transfer of information and records.		●	●	●	●				
B - Information and records planning is acceptable to stakeholders.		●	●	●	●		●		
VIII Public Education, Outreach, Information, and Notice									
A - List of stakeholders has been developed and is being updated.						●			
B - Updated administrative record is available to interested parties.		●	●			●			
C - Public involvement costs are estimated and funded.	●	●				●		●	
IX Natural, Cultural, and Historical Resource Management Requirements									
A - System is in place to protect information that is sensitive.			●			●			
B - Biological resources, T&E species, archeological resources identified.		●				●			
C - Location and characterization of resources needing LTS&M identified.		●				●			
X Business Closure Functions, Pension & Benefits, Contract Closeout or Transfer, and Other Administrative Requirements									
A - Responsibilities for administration and funding of claims and benefits identified and planned.							●		●
B - Current contractor pensions and benefits are identified and planned.							●		
C - Status of pending litigation and liabilities identified.							●		
D - Contract termination action identified (usually completed by site owner).	●	●				●	●	●	●
E - Requirements of DOE orders satisfied.					●		●		●

●	Represents primary responsibility for CD-4 Documentation
●	Represents supporting responsibility for CD-4 Documentation

Appendix C

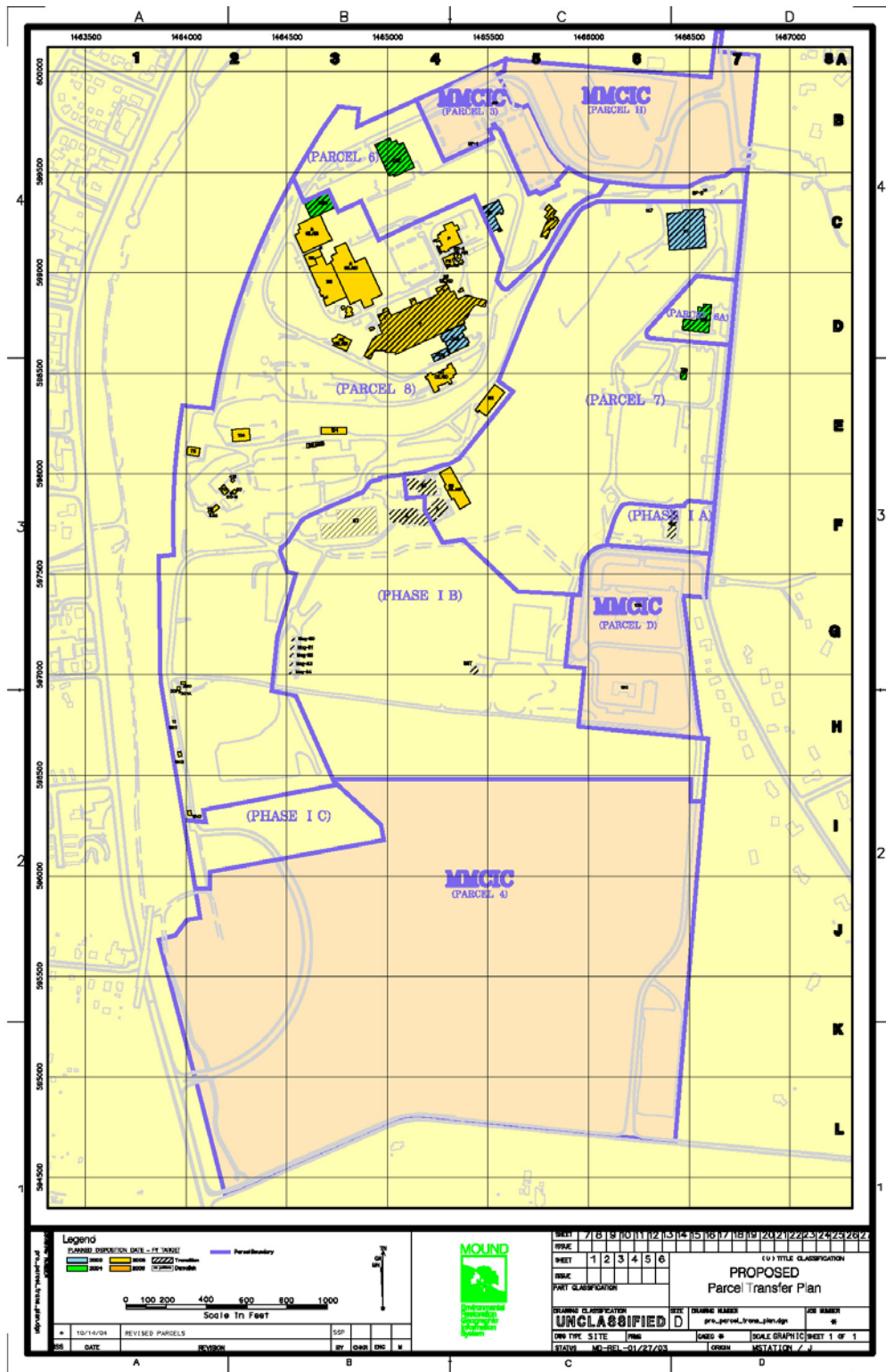
Mound Site Background and Map With Parcel Boundaries

The Mound site, formerly known as the Mound Plant, takes its name from a nearby Native American burial mound. Appendix C presents a map of the site. The facility is sited on a hill in the center of Miamisburg, Ohio, and is constructed on approximately 306 acres. Construction of the Mound Plant began in 1946, and the site became operational in 1949. Mound, the nation's first post-war U.S. Atomic Energy Commission site to be constructed, was established to consolidate and continue the polonium-related work conducted at the Dayton Units.

Much of the work at the Mound Plant during the Cold War involved production of the polonium-beryllium initiators used in early atomic weapons and the manufacture of and research related to radionuclides. In the 1950s, the facility began to manufacture a variety of nuclear weapons parts, including cable assemblies, explosive detonators, and the electronic firing sets that activated them. Work at the Mound Plant evolved and grew to include stable isotope separation, fossil fuels research, tritium recovery for reuse in weapons, development of radioisotopic thermoelectric generators used to provide electrical power for space exploration, and other non-nuclear research and development activities. The Mound Plant ceased non-weapons work in 1972 and stopped production of weapons components in 1995.

The current mission of DOE at the MCP is to clean up the site in accordance with the regulator-approved, stakeholder-endorsed, end-state project under CERCLA. In 1998, a sales contract was established between the MMCIC and DOE that allows for conveyance of the Mound property by discrete parcels to the MMCIC subject to the CERCLA 120(h) process. The first parcel of land was transferred to MMCIC in February 1999. Since that time, more than 40 percent of the site footprint has been transferred, including three additional parcels. With DOE support, MMCIC and the community formed a partnership to transition Mound for reuse as a technology and industrial park. MMCIC was chartered with the vision of establishing the Mound Advanced Technology Center to diversify the region's economy and to generate new job opportunities for dislocated DOE contractor workers and other area residents. DOE has supported the economic development effort with grants and matching funds totaling more than \$62 million. The Mound Advanced Technology Center currently houses 27 businesses with a total of 325 employees.

By September 30, 2005, all nuclear material and waste will be shipped off site, facilities will be demolished or transitioned, and environmental remediation activities will be complete. The programmatic and financial responsibilities for maintenance of the CERCLA remedy are scheduled to be transferred to LM by October 1, 2006. Appendix C presents a map of the 306-acre MCP site showing the division of the site into discrete land parcels. Parcels D, H, 4, and 3 have already been conveyed (via quit claim deed) to MMCIC. The Phase I parcel (which consists of three subparcels) has completed the CECLA 120(h) requirements for property transfer; however, DOE has yet to offer the parcel to MMCIC for conveyance. At present, all remaining acreage that has not completed the CERCLA 120(h) process has been divided into three parcels (6, 7, and 8). However, the number, or the physical boundaries of the remaining parcels may change to better facilitate timely EM completion and DOE site closure.



Appendix D

Mound Configuration Control Milestones

This appendix presents a graphical representation of the key milestones for the MCP transition project. The milestones presented in this appendix are the key milestones described in Chapter 4 and are under configuration control.

Task Name	2004			2005			2006					
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
STP approved by EM-1 and LM-1												
EM issues PBD to transfer Site budget authority												
Physical work completed												
LSO Established												
All Potential Release Sites are closed												
DOE transmit draft Final Site ROD for approval												
Declaration of physical completion												
LTS&M Plan signed by LM-1												
LM receipt of final records inventory												
DOE conveys final parcel to MMCIC												
CD-4 package approved												
LM accepts Mound Site												
<p>Project: Mound Configuration Control Milestones Date: 2/22/2005</p>												

STP approved by EM-1 and LM-1 ◆ 3/31

EM issues PBD to transfer Site budget authority ◆ 8/1

Physical work completed ◆ 9/30

LSO Established ◆ 7/31

All Potential Release Sites are closed ◆ 11/30

DOE transmit draft Final Site ROD for approval ◆ 3/30

Declaration of physical completion ◆ 3/30

LTS&M Plan signed by LM-1 ◆ 4/30

LM receipt of final records inventory ◆ 9/30

DOE conveys final parcel to MMCIC ◆ 9/30

CD-4 package approved ◆ 9/30

LM accepts Mound Site ◆ 10/1

Milestone ◆

Appendix E

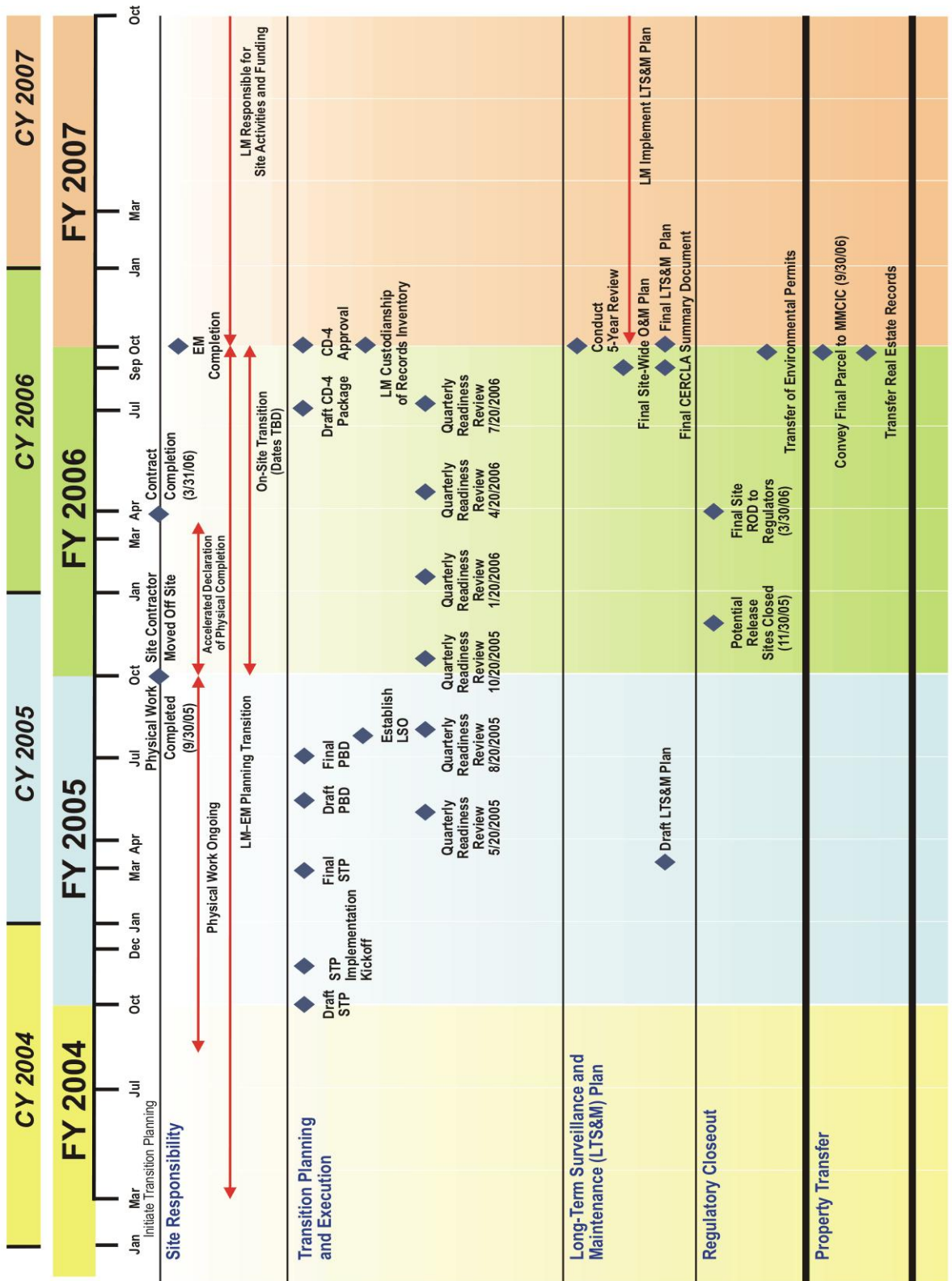
Sample Outline for a Turnover Package

1. Overview of WBS element
 - 1.1 Objectives and scope of the element
 - 1.2 Operational constraints and/or requirements (summarize or reference)
 - 1.3 Deliverables (reports, products, work completed) and schedules
 - 1.4 Specific end-point criteria for acceptance
2. U.S. DOE and regulatory organizations
 - 2.1 Review of DOE organizational interfaces
 - 2.2 Review of all regulatory interfaces
 - 2.3 Review of issues and commitments related to regulatory oversight
3. Status
 - 3.1 Completion status/results
 - 3.2 Problems and corrective actions
4. Resource Analysis
 - 4.1 Funding or budget issues and corrective action(s) to resolve those issues
5. Other Issues
 - a. Issues and corrective actions, including environmental, legal, or stakeholder issues.
6. Certificate of Turnover Activity, which will be signed by the MCP Transition Project Manager, the Office of Legacy Management Site Transition Coordinator, and the lead for each business element upon completion of the turnover package.

Appendix F

Mound Transition Timeline

Mound Transition Timeline



3/24/2005

Appendix G

Acronyms

CBC	Consolidated Business Center
CD-4	Critical Decision-4
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
COBRA	Consolidated Omnibus Budget Reconciliation Act of 1985
DOE	U.S. Department of Energy
DOL	U.S. Department of Labor
EEOICPA	Energy Employees Occupational Illness Compensation Program Act
EM	U.S. Department of Energy Office of Environmental Management
EPA	U.S. Environmental Protection Agency
FFA	Federal Facility Agreement
FOIA	Freedom of Information Act
FY	Fiscal Year
IC	Institutional Control
IT	Information Technology
LM	U.S. Department of Energy, Office of Legacy Management
LSO	Local Stakeholders Organization
LTS&M	Long-Term Surveillance and Maintenance
MCL	Maximum contamination level
MCP	Miamisburg Closure Project
MEIMS	Mound Environmental Information Management System
MMCIC	Miamisburg Mound Community Improvement Corporation
MNA	Monitored Natural Attenuation
NARA	National Archives and Records Administration
NEPA	National Environmental Policy Act of 1969
NPL	National Priorities List (40 <i>Code of Federal Regulations</i> 300, Appendix A)
NRDA	Natural Resources Damage Assessment
NSC	National Stewardship Contractor
O&M	Operations and Maintenance
OECM	Office of Engineering and Construction Management

OFO	Ohio Field Office
Ohio EPA	Ohio Environmental Protection Agency
OU	Operable Unit
PA	Privacy Act
PBD	Program Budget Document
PRS	Potential Release Site
RBES	Risk-Based End State
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
STF	Site Transition Framework
STP	Site Transition Plan
TBD	To Be Determined
WBS	Work Breakdown Structure

Appendix H

Glossary of Terms for Site Transition and Transfer

The following terms are provided to ensure that the proper term definitions are clearly identified and understood during site transition. These terms will be limited to only those terms that are included in this Site Transition Plan.

Contractor’s Declaration of “physical completion” – The EM contractor must have completed the following items:

- 66 buildings demolished, 73 Potential Release Sites (PRSs) closed, and site utilities transferred or shut down;
- Parcels 6, 7, and 8 and transfer documents prepared and regulatory documents approved by DOE;
- Other physical work regarding closure of the remaining aboveground utilities;
- Other administrative functions complete (i.e., records,); and
- Functions transferred to LM.

Note: DOE Contracting Officer must approve the declaration of “physical completion” before the closure contract is deemed complete.

DOE site closure occurs for DOE-owned sites when ownership of all real property is transferred to a non-DOE entity. DOE site closure is not required for EM completion.¹

EM completion occurs when the following conditions are met: (1) all required short-term response activities at a specific site are complete (e.g., soil excavation, cap construction, building decommissioning); (2) all required long-term response measures (e.g., groundwater treatment systems) are constructed, operational, and functional; (3) all necessary documentation is in place (e.g., engineering certifications/and verifications, post-closure or operating permits, final site conditions/configuration records); and (4) the site is administratively transferred from EM responsibility to another DOE, federal, state, or private entity.²

Long-term response actions constitute the set of activities at a site following EM completion that are required as a result of ongoing operations, maintenance, or monitoring that is necessary to manage residual contamination above levels allowing unrestricted uses.³

Physical work completion – The EM contractor must have completed the following items:

¹ “DOE site closure” is defined in the EM-1 memorandum (dtd 2/12/03) titled “Definition of Environmental Management Completion,” and the associated DOE National Focus Project Fact Sheet titled “Definition of EM Completion and DOE Site Closure.”

² “EM completion” is defined in the EM-1 memorandum (dtd 2/12/03) titled “Definition of Environmental Management Completion” and the associated DOE National Focus Project Fact Sheet titled “Definition of EM Completion and DOE Site Closure.”

³ “Long-Term Response Action (LTRA)” is defined in the EM-1 memorandum (dtd 2/12/03) titled “Definition of Environmental Management Completion,” and the associated DOE National Focus Project Fact Sheet titled “Definition of EM Completion and DOE Site Closure.” LTRA is further defined in the EM-1 memorandum (dtd 6/10/03) titled “Transition of Long-Term Response Action Management Requirements,” and the associated DOE National Focus Project Fact Sheet titled “EM Completion: Transitioning LTRA Responsibilities.”

- 66 buildings demolished, 73 PRSs closed, and site utilities transferred or shut down;
- Parcels 6, 7, and 8 and transfer documents prepared and regulatory documents approved by DOE; and
- Other physical work, regarding status and closure of any remaining aboveground utilities.

Transfer (a milestone) is the handoff of programmatic and financial responsibility from one program to another. Transfer is a specific point in time or a specific event and is a milestone.

Transition (a process or phase) refers to the progression of a project from implementation (cleanup) to turnover for LTS&M operations. Transition is the passage from the phase during which engineered, near-term actions are taken to mitigate environmental and human health risks to the next phase where residual risks will be maintained in a sustainable and safe condition.

Appendix I

Crosswalk of Mound Transition Functions

Crosswalk of Mound Transition Functions

Site Transition Plan WBS (October 2004)	Ohio Field Office Federal Business Baseline Functions (September 2003)	Mound Closure Project Post Closure Responsibility Scoping Checklist (June 2004)
1. Program Management	1. Funding 10. Litigation 11. Compliance	3. Program Management 11. Security
2. Environmental	5. Landlord Responsibilities 7. Remedy Maintenance	2. Regulatory Drivers 4. Remedy Management 6. Engineering, Environment & Technical Information
3. Records Management	2. Records Management 10. Litigation	5. Records and Information Administration
4. Information Management	3. Information Management	5. Records and Information Administration
5. Property Management	9. Property	7. Property
6. Stakeholder and Regulator Relations	4. Stakeholder and Regulator Interface	8. Community Relations
7. Worker Pension and Benefits	6. Retiree Pension and Medical	10. Personnel
8. Procurement	8. Procurement	9. Procurement & Finance
9. Project Close-Out	1. Funding	

Site Transition Plan WBS (October 2004)
1. Program Management
2. Environmental
3. Records Management
4. Information Management
5. Property Management
6. Stakeholder and Regulator Relations
7. Worker Pension and Benefits
8. Project Close-Out Activities
9. Procurement