

# DOCUMENT PRODUCTION PROCEDURES

## ACRONYMS

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|--------|---|
| AM     | Action Memorandum   |
| AR     | Administrative Record   |
| ARC    | Administrative Record Coordinator   |
| BJC    | Bechtel Jacobs Company LLC  |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act of 1980 |
| DOE    | U.S. Department of Energy   |
| EMEF   | Environmental Management and Enrichment Facilities                            |
| FFA    | Federal Facility Agreement  |
| OREIS  | Oak Ridge Environmental Information System                                    |
| ORR    | Oak Ridge Reservation   |
| ROD    | Record of Decision  |

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These Annotated Outlines were developed as a guide for writing CERCLA documents at the Oak Ridge Reservation. They have been approved by the Department of Energy, but have not been formally approved by the EPA or the State of Tennessee. Revisions may be done to the outlines as regulatory comments are received. Please submit any relevant content comments or ideas to Julie Pfeffer (o1f@bechteljacobs.org or 241-1602). Controlled copyholders will receive these updates. These outlines and any revisions are available at <http://www.bechteljacobs.org/busmgt/TechIntegHome.html>.

Documents are to be prepared in accordance with the provisions of applicable Bechtel Jacobs Company LLC (BJC), DOE, and regulator guidance documents. The *Annotated Outlines for Documents Required by FFA and CERCLA for Oak Ridge Reservation Sites* were developed to ensure document content and format consistency across the Oak Ridge Reservation (ORR). The outlines were developed to comply with CERCLA and the National Contingency Plan, integrating the National Environmental Policy Act of 1969, and other applicable or relevant and appropriate requirements. As required, these outlines are revised and maintained to reflect new regulatory requirements and/or to document comments received from regulatory agencies as the CERCLA remediation process for the various sites progresses.

In addition, FFA and CERCLA documents are to be prepared in accordance with *Requirements for Bechtel Jacobs Company LLC Documents*, BJC/OR-60/R2 (available at [http://www.bechteljacobs.com/irm/dc\\_style.htm](http://www.bechteljacobs.com/irm/dc_style.htm)), using clear, concise English and precise technical language. All documents submitted are to be complete, properly formatted, and free of grammatical and typographical errors. Each document will be numbered as required by the BJC/OR-60/R2.

### Administrative Record Requirements

1. The Administrative Record (AR) is to be on distribution for three copies of all FFA primary and secondary documents.
2. The review cycle protocol for FFA primary documents (FFA Appendix I) depicts the maximum negotiated durations for the various components of a primary document review cycle. DOE has labeled the three critical deliverables in this cycle in the following manner:
  - D0 is the draft document submitted to DOE and DOE-Headquarters for review,
  - D1 is the draft document submitted to the regulatory agencies for review, and
  - D2 is the final document that incorporates all comments for approval.

In the event there are additional comments to the D2, a D3 may be submitted.

3. The AR must receive any additional documentation used or relied upon in the decision making process that is not documented elsewhere in the AR.
4. Hard copies of quality assurance reviews and other sampling data generated or referenced in the preparation of the Remedial Investigation or Engineering Evaluation/Cost Analysis must be turned over to the Environmental Management and Enrichment Facilities (EMEF) document management center to be identified in the AR. Section XXVIII of the FFA requires that all data/studies generated pursuant to this Agreement shall be made available to the environmental regulators in hard copy within 30 days after receipt of written request.

5. FFA Section XXXIII, requires DOE to submit the proposed AR Indexes to the environmental regulators with the D1 Record of Decision (ROD) or the Action Memorandum (AM) document for each CERCLA response action. DOE has requested that BJC provide it with a review copy of the proposed AR Index for its review with the submittal of the D0 ROD or AM.
6. The BJC Administrative Record Coordinator (ARC) will provide the proposed AR Index to the appropriate BJC contact 1-week prior to the scheduled D0/D1 ROD or AM delivery date to DOE. The ARC will also provide the appropriate language to be used in the transmittal letter to DOE.

### **Oak Ridge Environmental Information System (OREIS) Requirements**

1. The FFA dictates what is required concerning environmental data submissions. Section XXVIII (A) of the FFA requires that all quality-assured data contained in reports submitted to the environmental regulators pursuant to the agreement shall be made available to the environmental regulators in electronic format within 30 days after report submission.
2. Section XXVIII (C) of the FFA requires that DOE maintain the OREIS as one consolidated database for the ORR Site, which includes all data/studies generated pursuant to the agreement and those generated under federal and state environmental permits.
3. All data reported in documents listed in Appendix E of the FFA, and/or used to make environmental decisions are required OREIS entries.
4. Project data coordinators are responsible for providing verified/validated data in the appropriate format for entry into OREIS.
5. The OREIS FFA coordinator is responsible for extracting the project data sets from OREIS, preparing FFA electronic data deliverables in the format required, submitting electronic deliverables to the BJC Environmental Information Management program manager, and assisting EMEF projects with tracking deliverable schedules.
6. The Environmental Services Procedure, ES-A-3005, *Developing, Implementing, and Maintaining Data Management Implementation Plans*, defines roles of project data coordinators and other project team members involved in environmental data management. The Environmental Services Procedure, ES-A-3501, *Transmitting Environmental Data to the Oak Ridge Environmental Information System (OREIS)*, provides project guidance for submitting data to OREIS.