



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

APR 26 2019

Mr. Brian Begley
Federal Facility Agreement Manager
Division of Waste Management
Kentucky Department for Environmental Protection
300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601

PPPO-02-5529263-19

Ms. Julie Corkran
Federal Facility Agreement Manager
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street
Atlanta, Georgia 30303

Dear Mr. Begley and Ms. Corkran:

TRANSMITTAL OF THE D2/R1 SITE MANAGEMENT PLAN, PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY, ANNUAL REVISION—FISCAL YEAR 2018 AND FISCAL YEAR 2019 (DOE/LX/07-2418&D2/R1)

References:

1. Letter from T. Duncan to B. Begley and J. Corkran, "Paducah Federal Facility Agreement—Signed Memorandum of Agreement for Resolution of Formal Dispute Concerning Kentucky Department for Environmental Protection Nonconcurrency and U.S. Environmental Protection Agency Conditions Submitted on the *Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision—Fiscal Year 2018*, DOE/LX/07-2418&D2," (PPPO-02-5516127-19), dated April 4, 2019
2. E-mail from J. Corkran, to T. Duncan and B. Begley, "EPA Response - RE: KY Action Item Update from May 25th Non-Concurrence/Informal Dispute Meeting," dated June 8, 2018
3. E-mail from T. Duncan to J. Corkran, B. Begley, and J. White, "RE: KY Action Item Update from May 25th Non-Concurrence/Informal Dispute Meeting," dated June 7, 2018

Enclosed for approval is the certified *Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision—FY 2018 and FY 2019*, DOE/LX/07-2418&D2/R1 (SMP). This version of the SMP is consistent with the terms of the *Memorandum of Agreement for Resolution of Formal Dispute Concerning Kentucky Department for Environmental Protection Nonconcurrency and U.S. Environmental Protection Agency Conditions Submitted on the Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision—FY 2018*, DOE/LX/07-2418&D2 (MOA) (Reference 1) and the Kentucky Department for

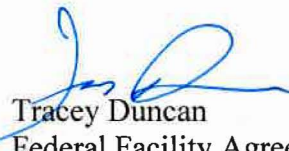
Environmental Protection (KDEP) and U.S. Environmental Protection Agency (EPA) agreement to the U.S. Department of Energy (DOE) response to undisputed General Condition 5 (References 2 and 3).

Per the MOA, the revised D2/R1 SMP has been renamed as the *Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision—Fiscal Year 2018 and FY 2019*, DOE/LX/07-2418&D2/R1, and reflects fiscal year (FY) 2018 and FY 2019. FY 2019 is included in the title to encompass the FY 2018 SMP completion timeframe, which extended into FY 2019; however, this SMP does not include the establishment of FY 2021 enforceable milestones. Those milestones, as well as those for FY 2022, will be discussed and agreed upon during the FY 2020 SMP scoping. Upon approval, the D2/R1 FY 2018 and FY 2019 SMP will supersede the approved FY 2015 SMP. The next annual update to the SMP will be for FY 2020, per the schedule specified in the Federal Facility Agreement.

A redline version of the D2/R1 FY 2018 and FY 2019 SMP is provided to assist with the review. DOE looks forward to EPA and KDEP approval of the D2/R1 FY 2018 and FY 2019 SMP. In accordance with the MOA, EPA and KDEP have 14 calendar days to review and provide written letters of approval.

If you have any questions or require additional information, please contact me at (270) 441-6862.

Sincerely,



Tracey Duncan
Federal Facility Agreement Manager
Portsmouth/Paducah Project Office

Enclosures:

1. Certification Page
2. FY 2018 and FY 2019 D2/R1 SMP (Clean)
3. FY 2018 and FY 2019 D2/R1 SMP (Redline)

e-copy w/enclosures:

april.ladd@pppo.gov, PPPO
april.webb@ky.gov, KDEP
arcorrespondence@pad.pppo.gov, FRNP
brian.begley@ky.gov, KDEP
chaffins.randall@epa.gov, EPA
bwhatton@tva.gov, TVA
christopher.jung@ky.gov, KDEP
christopher.travis@ky.gov, KDEP
corkran.julie@epa.gov, EPA
dave.dollins@pppo.gov, PPPO
dave.hutchison@pad.pppo.gov, FRNP
edward.winner@ky.gov, KDEP
frnrcorrespondence@pad.pppo.gov, FRNP
hill.franklin@epa.gov, EPA
hjlawrence@tva.gov, TVA
jana.white@pad.pppo.gov, FRNP
jennifer.blewett@pad.pppo.gov, FRNP
jennifer.woodard@pppo.gov, PPPO
joel.bradburne@ppppo.gov, PPPO
jon.maybriar@ky.gov, KDEP
kim.knerr@pppo.gov, PPPO
leo.williamson@ky.gov, KDEP
mmcrae@TechLawInc.com, EPA
myrna.redfield@pad.pppo.gov, FRNP
nathan.garner@ky.gov, KYRHB
pad.rmc@pad.pppo.gov, SSI
pope.robert@epa.gov, EPA
richards.jon@epamail.epa.gov, EPA
rkdehart@tva.gov, TVA
robert.edwards@pppo.gov, PPPO
stephaniec.brock@ky.gov, KYRHB
tabitha.owens@ky.gov, KDEP
tony.hatton@ky.gov, KDEP
tracey.duncan@pppo.gov, PPPO
walker.mary@epa.gov, EPA

CERTIFICATION

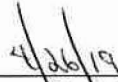
Document Identification: *Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision —FY 2018 and FY 2019, DOE/LX/07-2418&D2/R1*

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Four Rivers Nuclear Partnership, LLC



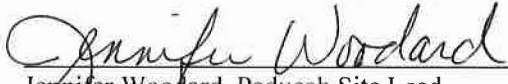
Myrna E. Redfield, Deputy Program Manager
Four Rivers Nuclear Partnership, LLC



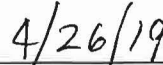
Date Signed

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U.S. Department of Energy



Jennifer Woodard, Paducah Site Lead
Portsmouth/Paducah Project Office
U.S. Department of Energy



Date Signed