

Internal Letter**Rockwell International***WS-LT-00112*

Date · June 22, 1987

No. · DL-GHS-10

TO (Name, Organization, Internal Address)

- G. W. Campbell
- HS&E
- Building 111

FROM (Name, Organization, Internal Address, Phone)

- G. H. Setlock
- HS&E Env. Mgmt.
- Building T452B
- 2453

SUBJECT · ENVIRONMENTAL ASSESSMENT - FLUIDIZED BED INCINERATOR

Per our recent communication, an interest in conducting an Environmental Assessment on the Fluidized Bed Incinerator (FBI) in Building 776 has been expressed by DOE-AL. As you are aware an Action Description Memorandum (ADM) was prepared on the FBI and forwarded to RFAO for transmittal to Albuquerque. Based on the summary findings of this ADM no further assessments (i.e. EA or EOA) are warranted on a technical basis. Apparently an environmental assessment is now being contemplated due more to political and legal reasons. Per your request, I have prepared pros and cons for how best to complete an environmental assessment on the FBI if one becomes mandated in the near future. For comparison purposes, the PRMP-EA has been fast-tracked along a five month schedule through Los Alamos Technical Associates (LATA) at a cost of \$228,000.

Please contact me if you require additional information or have any questions/comments.

George H. Setlock

G. H. Setlock
HS&E Operations Management



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cc:

- G. L. Potter
- W. F. Weston

ADMIN RECORD

IA- B776-A-00025

OPTION # 1 - COMPLETE ENVIRONMENTAL ASSESSMENT ON FBI WITH OFFSITE CONTRACTOR SUPPORT

PROS:

- o Objectivity (perceived by reviewers)
- o Dedicated, concerted effort
- o Previous experience with incinerator EAs

CONS:

- o Higher costs (Assuming a time frame more compressed than the PRMP-EA will result in significantly higher costs - \$400 - \$600 K range)
- o Requires contract implementation time (3 - 4 weeks?)
- o Depending on contractor selected, considerable time for briefings/document searches/interviews may be required by Rockwell/RFAO staff.
- o Internal technical reviews for accuracy required.
- o Compressed EA deadline (3 months?) may not be achievable regardless of cost.

OPTION # 2 - COMPLETE ENVIRONMENTAL ASSESSMENT ON FBI INTERNALLY
(ROCKWELL INTERNATIONAL STAFF)

PROS:

- o Lack of perceived objectivity (i.e. "in-house assessment").
- o Matrix team effort.
- o No contract implementation time required.
- o Compressed schedule can be met with crash team effort working extended work weeks.

CONS:

- o Lower costs (i.e. utilize internal staff personnel).
- o Other plant projects/tasks may be delayed/postponed.
- o EA will require technical review by outside party.
- o No previous experience doing an incinerator EA (PRMP-EA "boilerplate" may be transferable).

RECOMMENDATION:

PURSUE OPTION # 1 - COMPLETE ENVIRONMENTAL ASSESSMENT ON FBI WITH OFFSITE CONTRACTOR SUPPORT

RATIONALE:

PROS OUTWEIGH CONS - Issues of previous experience completing EAs on incinerators coupled with outside objectivity are paramount and outweigh financial considerations in this situation. Rockwell International staff involvements will still be considerable to contact/coordinate/review efforts of contractor personnel. Costs for an accelerated EA (\$400 - \$600 K) will still be substantially less than an EIS and should satisfy legal/political requirements. Some time can be saved through a sole source contract to LATA (if possible). LATA has previous knowledge of the Rocky Flats Plant through its involvement with PRMP-EA and has also completed three previous EAs on incinerators. An alternative contractor would be ASI/IT which is presently coming onboard as an 8A RCRA contractor at Rocky Flats. Reassigning the PRMP-EA team (Rockwell and RFAO) would also expedite the learning curves for assigned personnel resulting in expediting benefits.