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EG&G ROCKY FLATS

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November 17 1992

92 RF 13618

Robert M Nelson Jr
Manager
DOE, RFO

Attn S R Grace R J Schassburger

REQUEST FOR EXTENSION OF OU 1 IAG SCHEDULE FOR CORRECTIVE MEASURE STUDY/
FEASIBILITY STUDY (CMS/FS) RLB 0726 92

Ref M Hestmark ltr to F Lockhart Extension Request for OU 1 Milestones
November 5 1992

This letter is in response to the Environmental Protection Agency's (EPA's) letter of November 5 1992 concerning the extension request for Operable Unit No 1 (OU 1) Milestones EG&G Rocky Flats Inc (EG&G) sees three options for the CMS/FS schedule. The first option is to reiterate to the regulatory agencies our original request of 90 days the second is to request a 60 day extension and the third is to submit a draft Corrective Measure Study/Feasibility Study (CMS/FS) on the original IAG milestone date.

Option 1 the 90 day option is likely to be rejected based on the November 5 letter and subsequent meetings with the Department of Energy (DOE) the Colorado Department of Health (CDH) and EPA staff. Proceeding on this course without concurrence with EPA and CDH concurrence would likely result in stipulated penalties. **Option 2** maintaining the original IAG schedule would result in a substandard CMS/FS product that would need substantial revisions between the draft and final submittals. Our Work Package that covers this activity (12011) does not provide for such revisions.

Option 3 the 60 day extension may be the best compromise to all parties. However as DOE is aware FY93 funding established in Work Package 12011 specifically recognizes the 90 day schedule extension as a bounding cost assumption.

EG&G needs immediate direction from DOE on which of these schedule options EG&G should pursue. The proposed submittal dates based on a 60-day extension would be May 31 1992 for the Draft CMS/FS and November 24 1992 for the final CMS/FS.

An equally important technical problem is that portions of the work done in the Remedial Investigation (RI) lead directly into CMS/FS decisions. Because the RI schedule has been extended these pivotal decisions are not available to direct the CMS/FS work in the original time frame. A detailed discussion of some of these issues is attached. Briefly following:

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI
BY G T Ostd'ek 870
DATE 6-9-93

A-0001-000523

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CLASSIFICATION

UCNI	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE

not applicable
classification
office exemption
DATE

IN REPLY TO RFP CC NO

ACTION ITEM STATUS

OPEN CLOSED
 PARTIAL

TR APPROVALS
S.B. M.S.B.
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EPA guidance (Guidance for Conducting RI and CMS/FS Under CERCLA EPA Oct 88 Section 4.2.1) the remedial action objectives (RAOs) are to be established early in the CMS/FS process. The criteria for establishing the RAOs are the contaminants of concern, the exposure routes and the preliminary remediation goals. Until EPA and CDH review the RI report and return comments, these criteria are not definitized. Proceeding with CMS/FS work beyond these decision points would result in misdirected efforts and re-doing major work efforts.

As DOE is aware, CMS/FS work preliminary to these decision points is currently underway. An additional concern is that EG&G has deals with regulatory authority for OU 1. CDH seems intent on pursuing a RCRA type remedial action that considers clean closure performance standards for surface impoundments. EPA appears intent on following a CERCLA based approach that elucidates numerous risk management options from the CMS/FS.

Questions regarding this matter should be directed to C. B. Gee of Remediation Project Management at 966 8550.



R. L. Benedetti
Associate General Manager
Environmental Restoration Management

DMS dmf

Orig and 1 cc R. M. Nelson Jr

Attachment
As Stated