

It is not yet known what this policy will entail or whether EPA concurs. There is a high probability that this policy will require risk assessment and COC determination on an individual hazardous substance site (IHSS) by IHSS basis. This requirement is not covered under the present scope specified in the OU 2 Remedial Investigation work package (12021). In addition, if the anticipated CDH policy becomes a requirement, the December 16, 1993 scheduled date for delivery of the Draft Phase II RFI/RI Report to the regulatory agencies cannot be met. In addition, all downstream milestones will be slipped.

EG&G is requesting DOE guidance in order to produce an acceptable HHRA for OU 2. EG&G is aware of the efforts that DOE is taking with the regulatory agencies to resolve this issue and is committed to assisting with the effort. However, until these issues are resolved, EG&G requests that DOE provide direction on how to proceed with the HHRA issues, or direct EG&G to stop work until resolution is obtained. The following options were considered:

Option 1 - Continue to respond to negotiations

If EG&G continues to respond to changes due to negotiations, significant additional funding will be required to regenerate the COC TM, Toxicity Assessment TM, and potentially, the Exposure Scenarios TM. Regeneration of these TMs will delay or substantially alter previously completed RFI/RI tasks including groundwater, surface water and air modeling, plus all HHRA tasks. This would cause the December 16, 1993 date for submission of the Draft Phase II RFI/RI Report to the regulatory agencies to be missed. All downstream milestones would also be impacted. There is also the potential for several iterations of TMs and HHRA tasks resulting in substantially increased costs.

Option 2 - Work towards the previously scoped HHRA

EG&G has been notified in the above-referenced letter (b) that continuing to work towards the option proposed in the above-referenced letter (a) is unacceptable. This option consisted of an OU-wide HHRA with separate evaluation of some anomalies. However, this is the only option that would meet current cost and schedule requirements.

Option 3 - Stop work

If DOE issues a stop work order until resolution of HHRA issues, the result will be a missed deliverable date of December 16, 1993 for the Draft Phase II RFI/RI Report, slippage of all downstream milestones, and a potential increase in fines or penalties if the regulatory agencies do not grant a schedule extension. However, a clear direction for the HHRA resulting from resolution of risk issues with EPA and CDH will result in the production of an acceptable OU 2 HHRA. There is a significant possibility that TMs and tasks listed in Option 1 will have to be done again. However, costs would be less than for Option 1 since TMs and tasks would not be continuously changed during

J K Hartman
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93-RF-9152
Page 3

development At the time that resolution is achieved, a new schedule and cost estimate will be prepared

Because changes to the HHRA effort for OU 2 will require additional funding, and since proceeding without regulatory agency concurrence is unacceptable, EG&G recommends that the DOE issue a stop work order until the HHRA issues are resolved with EPA and CDH (Option 3) This will result in the smallest increase in funding requirements, the least amount of unnecessary work, and the best chance of an acceptable Draft Phase II RFI/RI Report

If you have questions regarding this letter, please contact A L Primrose of Remediation Project Management at extension 8618



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