



Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928



000020156

FEB 26 1993

93-DOE-02632

4 D102

Mr. Martin Hestmark
U.S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

Part 42 of the Interagency Agreement (IAG) provides for changes to the IAG. We are requesting a 9 month schedule extension for Operable Unit 2 (903 Pad, Mound, and East Trenches) Draft and Final RCRA Facility Investigation/Remedial Investigation (RFI/RI) Report. The current IAG due date for the Draft RFI/RI Report is March 12, 1993 and the Final RFI/RI Report is August 9, 1993. We are requesting an extension until December 16, 1993, and May 23, 1994, respectively.

The primary reasons for this request for extension includes the delays associated with Desert Storm, analytical laboratory turnaround times, and increase in scope associated with the Surficial Soil Sampling Plan. These delays are discussed in more detail in the enclosure.

As discussed with you in the February 18, 1993 meeting, we will be submitting Technical Memorandum No. 8 for the revision of the "Bedrock" Work Plan. We expect to be able to submit this to you by March 15, 1993.

If you have any questions, please contact Scott Grace of my staff at 966-7199.

Sincerely,


Robert M. Nelson, Jr.
Manager

Enclosure

ADMIN RECORD

A-DU02-000876

118

SUPPORTING DOCUMENTATION FOR OU 2 RI REPORT EXTENSION REQUEST

Per Paragraph 221 of the Interagency Agreement:

- A. Extend the milestone date of the Draft Phase II RFI/RI Report for OU 2 from March 12, 1993 to December 16, 1993, and the Final RFI/RI Report from August 9, 1993 to May 23, 1994.
- B. The length of the proposed extension is 9 months. As indicated below, there are some causes that exceeded 11 months (analytical laboratory turnaround times), and we are requesting 9 based on our current expectation on when we could deliver a Draft RFI/RI Report including results of surficial soil data and the field screening data. Technical Memorandum 8, revising the Bedrock Work Plan will go into detail on how field screening will be used in the Draft RFI/RI Report. Technical Memorandum 8 is expected to be delivered to you by March 15, 1993. All data will be in the Final RFI/RI Report.
- C. Good Causes. The primary basis for this extension request is related to the delays associated with Desert Storm, analytical laboratory turnaround times, and increased scope associated with surficial soil sampling. This and other causes are detailed below.
 1. Force Majeure.

During the beginning of 1991, the United States initiated military actions in the Persian Gulf War (Desert Storm). Security precautions throughout the DOE Weapons Complex, including the Rocky Flats Plant, were significantly tightened, resulting in delaying field work. DOE began the Inspection and Evaluation (I&E) program to assess the security integrity throughout the Weapons Complex. Delays in the mobilization of drill rigs, the security clearing of subcontractor personnel, and delays in operational effectiveness resulted.

2. A delay caused by another Party's failure to meet any requirement of the IAG.

Subcontracted analytical laboratory capacity was exceeded causing delays in receiving validated data. The IAG schedule reflects 63 day lab turnaround time for unvalidated data for all analytes and 21 days to validate the data. Actual average turnaround times for OU 2 validated data is 7 months for all analytes with some radionuclide analytical results exceeding an 11-month turnaround time. Although the delays exceeded 11 months, we are requesting an extension of only 9 months.

The Human Health Risk Assessment for OU 2 requires collecting surficial soil samples. This type of sampling was not identified during development of the original Alluvial Work Plan. EG&G submitted a Technical Memorandum (TM) to DOE/RFO in August 1992 to collect the samples. The Technical Memorandum was delayed in order to integrate sampling with the OU 2 Environmental Evaluation program. A revised surficial soil sampling Technical Memorandum was resubmitted and only recently approved.

The Phase II RFI/RI Work Plan (Alluvial) was submitted during December 1989 and approved by EPA and CDH during April 1990. EPA and CDH required Technical Memorandum No. 1 be written to amend the original Phase II RFI/RI Alluvial Work Plan to include sections for the Environmental Evaluation, Quality Assurance Addendum, the conceptual model for the Human Health Risk Assessment and updating the geology section based on Sitewide Geologic Characterization Study. (We also point out the "Alluvial" Work Plan also included investigation of the Bedrock No. 1 Sandstone, the UHU) Technical Memorandum No. 1 was issued in Draft form in February 1991. During this time the Field Sampling Plan and the pump test concept were clarified. Technical Memorandum No. 1 was not approved in Final form by EPA and CDH until July 1991.

Environmental Restoration (ER) document development time was longer than anticipated. Documents required by the IAG and approved by EPA and CDH included ER Standard Operating Procedures (SOP), the Quality Assurance Project Plan (QAPjP), Sitewide and OU specific Health and Safety Plans (H&SP), and the Environmental Management Radiological Guidelines (EMRG). These documents were not in place for the scheduled UHU field work mobilization date.

In May of 1991, DOE/HQ mandated the inclusion of a National Environmental Protection Act (NEPA) Categorical Exclusion (CX) into the permitting process for OU 2. This inclusion further delayed the commencement of field work.

The Environmental Restoration Decontamination Pad was not operational until August 1991. This delay was a result of resolving RCRA Part B Permit requirements, disposal of wastes generated from operating the Decontamination Pad and complying with Health and Safety standards. Also, subcontractor yard preparation was delayed due to the Resumption efforts at the Rocky Flats Plant. Permanent power could not be quickly supplied to the subcontractor yard rendering the subcontractor field trailers and facilities inoperative. Delays were incurred while this matter was being resolved.

To comply with proper H&SP standards, an Integrated Work Control Package (IWCP) was required prior to performing field work. Preparation of the IWCP for OU 2 also created delays. ER policy has since been changed and current OU operations use the ER Standard Operating Procedures (SOP) in lieu of the IWCP.

- D. Any related timetable and deadline or schedule that would be affected if the extension were granted.

It is obvious that the milestone(s) for the Corrective Measures Study/Feasibility Study and subsequent milestones will be affected. However, schedules for these milestones will be discussed at a future date.

Other Considerations:

Significant progress has been made in streamlining the preparation of the Draft RFI/RI Reports. Granting the extensions will allow for higher quality documents that will meet the IAG requirements for a Draft RFI/RI Report.