

EG&G ROCKY FLATS

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DIST	
LHOFF, F.H.	
LANCH, D.B.	
LEEN, J. H.	
LETZKE, J.C.	
LIRLINGAME, A.H.	
LOUCHER, D.W.	
LOVIS, J.G.	
LOVERED, J.E.	X
LOPERERA, D.W.	X
LORRIS, L.R.	
LOMANCIS, G.E.	
LODWIN, R.	
LOALY, T.J.	
LOFRSH, J.M.	
LOBBY, W.A.	
LOJESTIC, J.R.	
LOELLEN, J.B.	
LOORGAN, R.V.	
LORNELL, R.F.	
LOOTTER, G.I.	
LOADES, J.I.	
LOFFELL, B.F.	
LONFORD, T.H.	
LOANNON, W.M.	
LON LEUVEN, D.B.	
LORNER, B.P.	X
LOUNG, F.R.	X
LOKERNARD	X
LORNDT	X
LOVIT	X
LOKER, F.B.	
LOTCHEP, D.H.	
LORNIVAL, G.J.	
LOPRIER, D.R.	
LOLISON, W.R.	
LOLBEISEN, L.P.	
LORMAN, L.K.	
LOFFMAN, R.B.	
LOAMMAN, R.L.	
LOEG, D.M.	
LODENBERG, G.E.	
LOMON, E.R.	
LOHARDELLA, R.E.	
LORNER, H.I.	
LOLASOUEZ, R.N.	
LOLSON, J.M.	
LOHRES CONTROL	X
LOMITS MONT	X
LOM TRACKING	X
LOBRODIE	X
LOKNOX CLASSIFICATION	X
LOCNI	X
LONCCLASSIFIED	
LOCONFIDENTIAL	
LOSECRET	
LOTHORIZED CLASSIFIER SIGNATURE	<i>[Signature]</i>
LODATE	9/13/90
LOREPLY TO LTR NO	
LOR APPROVALS	<i>[Signatures]</i>
LORIG & TOP SECRET INITIALS	TCG SKM

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402-0464 (303) 966 7000

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HW
1/11/91

Robert M Nelson Jr
Manager
DOE, RFO

Attn Dave Simonson

LEAD TIME ON ENVIRONMENTAL RESTORATION DOCUMENTS

The following is in response to a DOE Memorandum from Dave Simonson ERD TO 8446 received September 11 1990 subject as above

During IAG negotiations last year the DOE proposed sequential reviews by EG&G DOE RFAO DOE AL and DOE HQ Neither EPA nor CDH would agree to sequential reviews and all DOE representatives (RFAO AL, DP EH and GC) agreed to concurrent reviews by DOE and EG&G Concurrent reviews were then put in the draft IAG schedules signed by DOE EPA and CDH in December 1989 Please be advised that a final document transmitted from EG&G to DOE is only for submittal to EPA/CDH All reviews have previously been conducted by both DOE and EG&G

During April 1990 DOE RFO sent EG&G a memorandum requiring ten additional days for DOE review As we indicated in our response to your memo the negotiated schedules do not allow time for additional activities EPA and CDH evaluated every day of scheduled work very diligently They did not allow any extra time in meeting schedules. Therefore EG&G assisted DOE in trying to negotiate additional time with EPA and CDH

Based on the April DOE request, an analysis was initiated to determine the schedule impact for an additional DOE review This would add ten days of new activities prior to every occurrence of agency submittals if no changes were required If additional changes were made more time to resolve issues and incorporate changes would be necessary

A what if scenario was prepared using OU 1 881 Hillside and OU 2 903 Pad of the IAG schedule Draft Issue 1 dated April 24 1990 This analysis was discussed in subsequent negotiation meetings The IAG schedule Draft Issue 1 B dated May 9 1990 Tab B Page 4 (Attachment 1) references the proposal to add this new DOE activity sequence The IAG negotiation meeting that followed this Draft 1 B issue of the schedules discussed this issue at great length The impact on the schedules based on the what if scenario was a 9 to 24 month schedule extension for each operable unit

The cumulative effect for the project over all operable units would result in a five to six year schedule extension This is not including additional time for resolution of any DOE issues

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REVIEW WAIVER PER
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SEP 17 1990

occurring in the management review The EPA and CDH representatives on the negotiation team determined that this impact was unacceptable Therefore the IAG schedule Draft 1-C dated May 29 1990 Tab C Page 4 (Attachment 2) references the decision NOT to implement the change Mr R.J Schassburger was the DOE representative at that meeting

EG&G would be happy to discuss this issue further at your convenience We are certainly ready to assist you in re-opening negotiations to gain additional time in the interests of producing a better quality product. Please note that all documents transmitted from EG&G to DOE are reviewed and approved by the appropriate Environmental Restoration group manager division manager department director and associate general manager prior to submittal of a final document.


J.M. Kersh Associate General Manager
Environmental Restoration & Waste Management

TCG:skm

Orig and 1 cc R.M Nelson Jr

Attachments (2)
As stated

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SCHEDULE-WIDE CHANGES (cont.)

Activity	Change	Justification	Critical Path
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Each submittal requires an EG&G/DOE review	An additional 10-day activity is being added for DOE management review	To allow management review and approval	C
	An additional activity for 10 days is being added for resolving comments and finalization of the document		

NOTES

- 1 The IAG needs to be clarified in its reference to the Quality Assurance Program Plan and the QA Project Plan Both are listed in the IAG milestones with identical dates We suggest the reference to the QA Project Plan be changed to QA Program Plan The IAG text (page 20) Section IV should be changed to reflect this
- 2 The QA Program Plan is currently being revised and will incorporate (ie, air, water, soil, biota) The draft is to be submitted October 1990 The Project Plan for OU2 Drilling (the next field activity) can be submitted 1 July 1990 Project QA & Health and Safety Plans are part of the work plans, not separate deliverables in the IAG
- 3 Discharge limits for radionuclides may be deleted
- 4 The OU1 881 Hillside restart of Phase IA Construction is forecast for May 15
- 5 The OU1 881 Hillside Phase IIB Construction was forecast to begin 11 May 1990, however, this is being reevaluated and is pending a new starting date

Attachment 2
May 29, 1990

NOTES

The proposal in Draft 1 B to include a 10-day period for DOE management review and a RFP 10-day activity to resolve comments for each document submittal was not approved by the renegotiation team.

Note #1 on Page 4 of Tab B has been resolved and reflected in the schedules

Note #2 on Page 4 of Tab B remains as is

Note #3 on Page 4 of Tab B The decision of the renegotiation team is that the discharge limits for radionuclides will not be deleted

DRAFT