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EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

MEMORANDUM

DATE: September 22, 1993

TO: Jack McGraw, Acting Regional Administrator, EPA Region VIII
Al Pauole, Acting Manager, Rocky Flats Office, DOE
Thomas Looby, Director, Office of the Environment, CDH
Harry Mann, General Manager, Rocky Flats Plant, EG&G

FROM: Rocky Flats Environmental Restoration Quality Action Team (QAT)

SUBJECT: Proposed Implementation Plans for QAT Recommendations on the Budget Process and the Solar Ponds Project

During our joint meeting with you on August 12, 1993, the QAT asked for feedback from our managers on the value and implementation status of recommendations previously sent to you by the QAT. Your encouraging words on the work accomplished to date were much appreciated.

Our understanding is that you would find it easier to make decisions and potentially direct your respective staffs to implement our recommendations, if those recommendations were presented along with an Action Plan outlining general implementation steps and identifying a lead agency/party. You also expressed a desire to have an official opportunity to concur/non-concur with the recommendations. As you requested, the QAT developed for your review, the attached Recommendations/Action Plans for the Budget Process and the Solar Ponds Project (see also QAT memoranda dated April 22, and July 29, 1993, respectively).

The QAT reviewed the recommendations in our memorandum dated October 29, 1992, relative to the procurement process and subsequent implementation. We concluded that DOE and EG&G concurred with the recommendations and had developed their own Action Plans. The QAT periodically monitors the progress on this implementation.

ACTION	DIST	LTR	ENC
BENEDETTI, R.L.		X	X
BENJAMIN, A.			
BERMAN, H.S.			
BARNIVAL, G.J.			
COPP, R.D.			
CORDOVA, R.C.			
DAVIS, J.G.			
FERRERA, D.W.			
FRANZ, W.A.			
GANNI, B.J.			
HEALY, T.J.			
HEDAHL, T.G.		X	X
HILBIG, J.G.			
HIBBY, W.A.			
HUESTER, A.W.			
HANN, H.P.		X	X
HARX, G.E.			
HICKENNA, F.G.			
HORGAN, R.V.			
HIZUTO, V.M.			
HOTTER, G.L.			
HILEY, J.H.			
HANDLIN, N.B.			
HATTERWHITE, D.G.			
HUBERT, A.L.			
HETLOCK, G.H.			
HULLIVAN, M.T.			
HANSON, E.R.			
HILKINSON, R.B.		X	X
HILSON, J.M.		X	X
Hutchins		X	X
Busby		X	X

CORRES CONTROL	x	x
ATS/T130G		
Edm Rec.	X	X

Reviewed for Addressee
Corres. Control RFP

7-28-93
DATE BY

Ref Ltr. #

OE ORDER # 5400

During late spring, James Hartman, DOE, proposed that the QAT identify obstacles to effective implementation of the Interagency Agreement (IAG). He raised the possibility of renegotiating the IAG in order to eliminate those obstacles. With your approval, the QAT identified obstacles which were communicated to you in a memorandum dated June 3, 1993. After our August meeting with you, the QAT further identified potential options for eliminating or reducing the impact of the obstacles. As agreed, our analysis was presented to you individually by your respective QAT representatives on or about August 31. The QAT is currently developing a proposed Action Plan for addressing the obstacles, which we hope to transmit to you by October 1, 1993.

Thank you for agreeing to meet with us in the EPA Conference Center (2nd floor) on October 8, 1993, from 9:00 to 10:30 a.m. The QAT's goals are to:

1. receive your general feedback on the Recommendation/Action Plan vehicle as a method of coming to closure on future QAT endeavors;
2. discuss the proposed Action Plans; and,
3. finalize your concurrence/non-concurrence on the Action Plans.

If you conclude, as you review the Action Plans, that you can not concur, please notify the QAT through your representative. The QAT will try to resolve any issues prior to the meeting so that the concurrence of all the parties may be achieved on October 8.

Sincerely,

The Rocky Flats Environmental Restoration QAT

ATTACHMENT II: SOLAR PONDS PROJECT
QAT RECOMMENDATIONS AND PROPOSED ACTION PLAN

In late spring 1993, a dispute arose relative to the Solar Ponds Project. The respective staffs of the agencies and contractor began to analyze problem areas and identified many of the same issues as the QAT. The Solar Ponds Project team began in early June to meet weekly to address many of these issues as a result of the Dispute Resolution process. However, the QAT is not certain that all issues have been resolved. In response to a request by the agencies' managers, the QAT hereby clarifies the recommendations made July 29, 1993 (memorandum attached), and proposes an Action Plan.

Recommendation:

Goals and objectives of the project should be clearly defined, understood, and owned by all stake holders. In order to facilitate this, more communication should occur between DOE, its contractor, and the regulators.

Action Plan:

- 1) DOE should develop draft goals for the project and direct EG&G to develop draft objectives to accomplish those goals.
- 2) Once DOE has internally approved its draft goals and objectives, DOE project management staff level personnel should work with staff counterparts from EPA and CDH to reach consensus on final draft statements of goals and objectives.
- 3) Solar Ponds project management technical staff should then present these final draft statements of goals and objectives to their respective managers for approval. Upon approval, the goals and objectives statements become final.

Recommendation:

Develop detailed project estimates, schedules, baselines, and other appropriate scope, schedule, and cost documentation consistent with DOE Order 4700.1 and the RFP Management Control System. Technical, schedule, and cost baselines should be developed, agreed upon, and owned by all stake holders.

Action Plan:

- 4) Using the final goals and objectives, DOE and EG&G should develop the detailed project estimates, schedules, baselines, and other appropriate scope, schedule, and cost documentation consistent with DOE Order 4700.1 and the RFP Management Control System.

- 5) Using the documentation developed in Step 4, DOE should be responsible for reaching consensus with EPA, CDH, and EG&G on the technical, schedule, and cost baselines. Once consensus is reached, DOE and EG&G should proceed through the formal Change Control Process to establish the agreed upon technical, schedule, and cost baselines as the Baseline.

Recommendation:

Evaluate the applicability and value added of implementing RFP administrative processes such as Operational Readiness Reviews, Safety Analysis Reviews, NEPA, etc.

Action Plan:

- 6) DOE should form a TQM Process Improvement Team to conduct an evaluation of RFP administrative processes such as Operational Readiness Reviews, Safety Analysis Reviews, NEPA, etc. This review should evaluate whether the implementation of these processes are applicable and add value to environmental restoration. Where no applicability or value added is found, DOE should take action to eliminate or reduce the impact of these processes to environmental restoration efforts.

CONCLUSION

These recommendations and Action Plan are specifically applicable to the Solar Ponds Project. The QAT has not evaluated any other Operable Units (OUs). However, the QAT recommends that DOE and EG&G review all OUs and evaluate whether these same recommendations are more generally applicable.

SOLAR PONDS PROJECT
QAT RECOMMENDATIONS AND PROPOSED ACTION PLAN

MANAGERS ACTION
(Please check one)

CONCUR

NON-CONCUR

Date

Jack McGraw
Acting Regional Administrator
EPA Region VIII

Date

Al Pauole
Acting Manager
Rocky Flats Office, DOE

Date

Thomas Looby
Director
Office of the Environment, CDH

Date

Harry Mann
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