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EG&G ROCKY FLATS

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ADMIN RECORD



000032427

94-RF-06660

June 21, 1994

Jessie M. Roberson
Acting Assistant Manager for Environmental Restoration
DOE, RFFO

OPERABLE UNIT-4 (OU-4) FUNDS EXPENDITURE FOR ON-SITE DISPOSAL OF TREATED SLUDGE - SGS-368-94

It is our understanding that Department Of Energy's (DOEs) OU-4 strategy is to promote onsite disposal of treated pondsludge as part of the Solar Ponds remedial action. The goal of DOE-RFFO as related to the EG&G program manager is to add that scope to the project without slipping the Interagency (IAG) milestone for "start of construction" currently set for September 27, 1995.

EG&G supports DOEs stated strategy and goals. In order to pursue the strategy for onsite disposal without impacting the "start of construction" milestone, numerous efforts must start immediately. However, onsite disposal of treated pond sludge does not yet have regulatory support; in fact, the regulators are not endorsing a remedial action that includes processed sludge disposal under the Solar Ponds cap (see attachment). We are faced, then, with pursuing two parallel courses of action to ensure the construction milestone is not impacted; the present project baseline and the onsite disposal alternative.

We have prepared the necessary Baseline Change Proposal (BCP) to pursue parallel efforts in the support of the onsite disposal alternative. FY 94 workscope would include a technical "white paper" and commencement of conceptual design and treatability studies, for a cost of \$549,490. This is significant additional cost for the parallel course of action. We have reservations committing this funding at this time. If the regulators and public do not endorse this approach, the resources expended may be perceived as being ultimately nonproductive.

EG&G recommends that no activities supporting redesign for onsite disposal be initiated until the strategy is aggressively pursued with the regulators and the public. Project progress would continue; however, the construction milestone would be impacted should sludge in the remediation be approved. Therefore, EG&G recommends that the issue be pursued aggressively with the regulators and that program redirection be taken only after resolution of the issue. However, if a change in scope is approved by the regulators, milestones could appropriately be modified by the parties.

The EG&G Environmental Restoration Management (ERM) Change Board conditionally approved BCP ERM-076-94 in support of the directives given by DOE-RFFO (attached two memos). The condition placed on the Board's approval is satisfied by this letter, which alerts DOE-RFFO that approval by the DOE Change Boards may lead to expenditures to support project development which may be ultimately rejected by the regulators.

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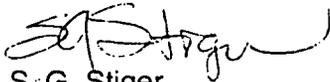
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Please provide us with written direction to proceed with implementing the proposed change in scope upon DOE's approval by the Change Boards.

Please contact me or S. R. Keith, X8541, if you have any questions regarding this matter.



S. G. Stiger
Director
Environmental Restoration Program Division

Orig. and 1 cc - J. M. Roberson

SRK:clh

Attachments:
As Stated

cc:
M. McBride
M. N. Silverman
L. Smith