

## SCHEDULE DELAYS

The Final Operable Unit No. 6 (OU 6) Work Plan was not approved by the Environmental Protection Agency (EPA) until February 27, 1992; it was scheduled to be approved October 15, 1991, a delay of four and one half months.

The procurement process for the implementation of the Work Plan was not in the Interagency Agreement (IAG) schedule. For contracts exceeding \$1 million, the procurement time under the Basic Order Agreement (BOA) system was three months.

An unexpected Organizational Conflict of Interest (OCI) issue with the subcontractor arose on June 8, 1992, after the procurement process was completed. Over one and one half months were required to resolve the OCI issue. There is no time allocated for unexpected contingencies such as this in the IAG schedule.

An approved Health and Safety Plan was required prior to starting field operations. The IAG schedule did not include the Health and Safety Plan. Writing the Plan, obtaining comments from seven reviewers, incorporating revisions and obtaining approvals required two months.

Other delays that occurred during approximately the same time period follow:

Compliance with Department of Energy (DOE) floodplain regulations (10 CFR 1022) was initiated by EG&G on Sept. 17, 1991 when EG&G sent the DOE, Rocky Flats Office (RFO) a draft "Notice of Intent" to undertake work in a floodplain. This notice was reviewed by RFO and forwarded to DOE Headquarters (HQ). The required publication in the Federal Register did not occur until seven months later (April 21, 1992).

The second phase of the 10 CFR 1022 compliance is publication in the Federal Register of the "Statement of Findings". EG&G sent a draft Statement of Findings to RFO on October 23, 1991. RFO reviewed that document and forwarded it to DOE HQ. It did not appear in the Federal Register until one year later (October 2, 1992).

A Categorical Exclusion (CX) for work in a floodplain cannot be approved until 15 days after publication of the Statement of Findings to allow a public comment period. RFO signed the CX on October 20, 1992. A significant portion of the OU 6 field work was required in floodplains and could not have commenced until after the CX was signed on October 20, 1992. This is one year past the IAG scheduled start date for field operations (October 17, 1991). Although limited field operations could have taken place, these would have been an inefficient use of labor and equipment.

The endangered Ladies Tresses Orchid was considered to have a potential habitat in many areas of OU 6. Field operations in those areas could not take place until the United States Fish and Wildlife Service approved the results of surveys indicating that there were no Ladies Tresses within the OU 6 area. The time frame that this process required was from June 3, 1992 through November 16, 1992 (five months).

The OU 6 Fiscal Year 1993 (FY 93) budget was substantially reduced which required the postponement of starting the Human Health Risk Assessment (HHRA).

ADMIN RECORD

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Cost savings in field operations reduced some of the budget shortfall. However, these savings were not actualized until near the completion of field operations, well into the second quarter of FY 93. The result was that the HHRA was delayed by approximately three months. Since the HHRA is on the critical path, the corresponding delay in the project is three months. Without the cost savings, the delay would have been six months.

There is no scheduled review time for the HHRA Technical Memoranda (TM) in the IAG Schedule. The addition of 16 working days of review time that have been requested by DOE for each of the four TMs will add three months to the schedule.