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DOE ORDER#

93 RF 14625

EG&G ROCKY FLATS 120693-10

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December 1, 1993

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M E Van Der Puy, Director
Environmental Protection Division
DOE, RFO

PROJECT STATUS REPORT ON POND WATER INTERIM MEASURE/INTERIM REMEDIAL ACTION (IM/IRA), COST ACCOUNT AA06, WORK PACKAGE 12850, MILESTONE 12850001A - DELIVERABLE DUE DECEMBER 1, 1993 - NMH-613-93

This letter is transmitted to the Department of Energy at the Rocky Flats' Office (DOE, RFO) in compliance with the Project Status Report milestone 12850001A requirement

At the beginning of this quarter, the preparation of an IM/IRA Decision Document was behind schedule by approximately two weeks due to the unexpected loss of a key person. Efforts by EG&G to combine increased in-house support with redirected subcontractor services resulted in the project being back on schedule by October 15, 1993. The forward momentum culminated in the document being submitted to DOE, the Colorado Department of Health (CDH), and the Environmental Protection Agency (EPA) by November 22, 1993 - eleven weeks ahead of schedule.

Bi-weekly meetings were held between EG&G and DOE, RFO to discuss IM/IRA project status and resolution of issues. For example, at the September 15, 1993 meeting DOE, RFO authorized the use of the term "benchmarks" in place of "Applicable or Relevant and Appropriate Requirements (ARARS)" in the IM/IRA Decision Document.

Several "brainstorming" sessions were held between EG&G and the subcontractor to develop eighty-two potential pond water management options. All options were evaluated against nine EPA criteria developed for the analysis of interim remedial action alternatives (Guidance on Preparing Superfund Decision Documents, by the Office of Solid Waste and Emergency Response Directive 9355 3-02). Sections of the IM/IRA Analysis, Air Permitting and Compliance, Ecology and National Environmental Policy Act, General Counsel, Federal Facilities Compliance Agreement Programs (technical editing), Environmental Restoration Management, and Surface Water

A memorandum was sent from DOE, RFO on October 14, 1993, directing EG&G to release Chapters 1-4 of the Draft IM/IRA Decision Document to DOE, RFO for review. This review would have no associated milestones or penalties, and no comments would be formally submitted to EG&G. Any DOE, RFO concerns would be discussed in the bi-weekly meetings. EG&G formally transferred Volumes I and II of the Draft IM/IRA Decision Document to DOE, RFO on October 21, 1993. No comments were received from DOE, RFO.

De Mass T.R.

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ADMN RECORD/0802	X	X
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CLASSIFICATION	
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AUTHORIZED CLASSIFIER SIGNATURE

DOCUMENT CLASSIFICATION REVIEW WAIVER PER DATE CLASSIFICATION OFFICE

IN REPLY TO RFP CC NO

ACTION ITEM STATUS
 PARTIAL/OPEN
 CLOSED
LTR APPROVALS

ORIG & TYPIST INITIALS
T.R.D.:C.M.

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE

The October 15, 1993 internal milestone, to complete Chapters 1-5 of the Draft IM/IRA Decision Document, was finished on schedule. Technical EG&G in-house review of the document began immediately and was completed on November 2, 1993, two weeks ahead of schedule. EG&G decided to shorten Chapters 1-3, which provided background information and determination of "benchmarks" and to expand the detail within the option rejection and selection sections of Chapters 4 and 5. EG&G also decided to publish the appendices separately as Volume II.

Chapter 6 of the Draft IM/IRA Decision Document, which describes implementation plans for the selected options, was submitted to EG&G by the subcontractor on the scheduled date of October 29, 1993. Technical concerns, which surfaced during the EG&G in-house review, required several EG&G personnel to meet repeatedly with the subcontractor to completely rewrite Chapter 6.

The subcontractor requested additional funding to complete the Draft IM/IRA Decision Document. EG&G denied this request, due to contractual and quality concerns, and held the subcontractor to their most recent cost estimate. However, EG&G did agree to publish the document through the RFP Printing Department. Additionally, EG&G provided a part-time technical person to assist the subcontractor in document preparation, to provide technical editing, and to act as a resource beginning November 8, 1993 in order to produce a quality document by November 22, 1993.

EG&G received verbal instructions from DOE, RFO on November 18, 1993 to expedite the schedule and deliver the Draft IM/IRA Decision Document to DOE, RFO by 1:00 PM on November 22, 1993 for their submittal to CDH and EPA on the same day. EG&G obtained a letter contract, with a modified scope of work, through Procurement on November 19, 1993 to allow the subcontractor to provide support for this accelerated effort.

Eight copies of the Draft IM/IRA Decision Document (Volumes I and II) were hand delivered to DOE, RFO at 1:00 PM on November 22, 1993. The original, written schedule required submittal of this document to DOE, RFO on December 15, 1993 and submittal to CDH and EPA on February 7, 1993. The November 22, 1993 submittal expedited the schedule by eleven weeks.

The November 22, 1993 concurrent submittal did not allow EG&G upper management to review the document prior to submittal to DOE, RFO. Also, DOE, RFO upper management and DOE Headquarters were not able to review the document prior to submittal to the agencies.

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There has been no resolution from CDH and EPA concerning the completion date for the combined National Pollutant Discharge Elimination System (NPDES) and Stormwater permit. Therefore, the remaining schedule for completion of the Pond Water Management IM/IRA Decision Document is undefined.



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EG&G Rocky Flats, Inc

TRD crw

Orig and 1 cc - M E Van Der Puy

cc

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