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United States Government

Department of Energy

memorandum

Rocky Flats Office

DATE: DEC 1 7 1993

REPLY ATTN OF: ER:BKT:13980

SUBJECT: EG&G Responses to Environmental Protection Agency and Colorado Department of Health Comments on Statistics Strawman (NMH-606-93), dated November 30, 1993

TO: Ned Hutchins, Acting Associate General Manager
Environmental Management
EG&G Rocky Flats, Inc.

This memorandum is in response to the above-referenced document from EG&G regarding the statistics strawman outlining the methodology for comparing Operable Unit RFI/RI data with background data. You should note that prompt resolution of this matter is necessary so that work can proceed on background comparisons.

The initial DOE/RFO memorandum requesting responses to Environmental Protection Agency (EPA) and Colorado Department of Health (CDH) comments was ERD:BKT:12637, dated November 3, 1993. We also requested that responses to comments be prepared for EPA and CDH comments on Dr. Gilbert's proposed methodology, dated July 30, 1993. These comments were dated September 13 and 21, 1993, respectively, and were provided as attachments to our memorandum. No responses to these comments have been provided as requested by DOE/RFO. You are currently approximately one month behind on this task. We request that EG&G prepare responses to these comments immediately and that the responses accompany the final revision of the statistics methodology.

Members of our staffs met on December 14, 1993, to discuss the responses to comments and the statistics methodology contained in your November 30, 1993 memorandum. The attached comments were verbally presented to EG&G at this meeting. Please find attached DOE/RFO comments on your responses to EPA and CDH comments, dated October 25 and 13, 1993, respectively. Several responses do not adequately address concerns expressed by EPA and CDH. In addition, the statistics methodology does not reflect their concerns. We request that EG&G modify the responses and the statistical methodology per the attachment. In addition, we request that DOE/RFO comments on the statistics methodology be incorporated.

All responses to comments and modifications to the statistics methodology requested in this memorandum should be transmitted to DOE/RFO by December 24, 1993.

Once these requests have been completed, EG&G may proceed with the background data comparisons to RFI/RI data at OUs 2 through 7.

Martin H. McBride
Acting Assistant Manager for
Environmental Restoration

Attachment

cc w/Attachment:
R. Schassburger, DAMER, RFO
AMER Project Managers, RFO (Thatcher)
A. Howard, EPD, RFO
W. Busby, EG&G
S. Needler, EG&G
R. Roberts, EG&G

DOE RFO comments on Attachment A - EPA comments, dated October 25, 1993

comment 6 page 2	Under additional clarification, explicitly state that decision blocks are not needed as well as the reason.
comment 7 page 3	We request that the first sentence of the response be deleted. It is not appropriate for references to EG&G and their memoranda to DOE/RFO to be referenced here. In addition, with regard to the 200 hours required for the application of the Gehan test at OU 11, we request that additional information be added that addresses the time required for developing the computer code. This is critical since coding will not need to be repeated for any of the remaining OUs. The current methodology is indeed an increase in scope over the upper tolerance limits previously planned. Thus, this information needs to be accurately relayed to EPA and CDH. We urge EG&G to provide adequate backup to support our contention of increased scope and likely impacts on our OU schedules.

DOE RFO comments on Attachment B- CDH comments, dated October 13, 1993

comment 9	The preliminary exploratory data appraisal was included in the original strawman document by EG&G. At this time, DOE/RFO verbally requested that it be moved to the data presentation section. At no time, did DOE/RFO request that the section be deleted as was done by EG&G. CDH has formally requested that this section be moved to the data presentation section. We request that the data appraisal section be put back in the statistics methodology in the data presentation section. EG&G cannot arbitrarily decide to delete text previously presented to the regulators.
comment 10	We request that language be inserted into the methodology as requested by CDH to provide a review of the informal data analysis to EPA and CDH.
comment 13	References to geochemical standards should be deleted and replaced with background data from the literature. They are not the same!

DOE/RFO comments on the "Guide for Conducting Statistical Comparisons of RFI/RI Data to Background Data at the Rocky Flats Plant"

comment 1	We request that the methodology be revised to incorporate the above-listed requests regarding the responses to comments.
comment 2	The upper tolerance limit tables should be cleaned up so that they can be transmitted to the regulators. Copies without handwritten notes should be provided. Add upper tolerance limits for surface water and sediments. Currently the tables are incomplete.