

CORRES. CONTROL
OUTGOING LTR. NO.

53853

DOE ORDER # 4700.1
95RF03297

EG&G ROCKY FLATS

DISTRIBUTION	LTR	ENC
AMARAL, M.E.		
BURLINGAME, A.H.		
BRANCH, D.B.		
CARNIVAL, G.J.		
DAVIS, J.G.		
FERERRA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAHL, T.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MARX, G.E.		
MCDONALD, M.M.		
MCKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RISING, T.L.		
SANDLING, N.B.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STEWART, D.L.		
STIGER, S.G.	X	
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		
PRIMROSE	X	X
SCHUBBE	X	X
RAY	X	X

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

April 28, 1995

95-RF-03297

Jessie M. Roberson
Assistant Manager for
Environmental Restoration
DOE/RFFO

RESPONSE TO THE DEPARTMENT OF ENERGY/ROCKY FLATS FIELD OFFICE (DOE/RFFO) REGARDING EXPEDITING THE ENVIRONMENTAL RESTORATION (ER) 2000 SCHEDULE FOR OPERABLE UNIT (OU) 15 - SGS-120-95

Action: Request Department of Energy/Rocky Flats Field Office (DOE/RFFO) provide EG&G Rocky Flats, Inc. (EG&G) with written guidance regarding acceleration of the ER 2000 schedule for OU 15

This correspondence has been prepared in response to DOE/RFFO's verbal request for a copy of a working schedule which includes submittal of the Final Corrective Action Decision/Record of Decision for OU 15 by September 29, 1995. Please find attached a copy of the working schedule and associated assumptions.

The EG&G Rocky Flats, Inc. experience with work governed under the current Interagency Agreement leads us to recommend that DOE/RFFO not sign up for a new enforceable milestone with the regulatory agencies for submittal of the Final Corrective Action Decision/Record of Decision for OU 15 by September, 1995. This recommendation is given on the basis that a large number of factors are not within our control. As a result, any delays by regulators will require DOE/RFFO to request extensions, and this continues to put Rocky Flats Environmental Technology Site in a bad light.

However, EG&G is committed to meeting the goal of a Final Corrective Action Decision/Record of Decision submittal by September 30, 1995 and will support DOE/RFFO in this regard. If DOE/RFFO decides to commit to this date as a tool to challenge the regulators, EG&G recommends obtaining the following commitments from the regulators:

- DOE/RFFO obtains concurrence from the regulators that the schedule performance periods will be met.
- Any schedule extensions required due to regulatory agencies or public actions are automatically granted and do not require formal request by DOE/RFFO. These include:
 - extensions to public comment periods;
 - extensions due to extended agency comment periods; and
 - extensions due to new issues.
- All parties agree that all reviews are final. No further comments or issues will be raised after the end of the review period.

CORRES. CONTROL	X	X
ADMIN RECORD	X	X
PROJECT FILE	X	X
PATS	X	

CLASSIFICATION	
UCNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE
DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

IN REPLY TO RFP CC NO:
00952-RF-95

ACTION ITEM STATUS:
PARTIAL/OPEN
CLOSED

LETTER APPROVALS:
ALP: ALP
ORIGINATOR & TYPIST INITIALS
DLS:jlm

ADMIN RECORD

A-OU15-000233

Jessie M. Roberson
April 28, 1995
95-RF-03297
Page 2

An increase in fiscal year 1995 scope will be necessary to accelerate the schedule for OU 15 to meet the September 29, 1995 goal for submittal of the Final Corrective Action Decision/ Record of Decision for OU 15. Scope associated with preparation of the Corrective Action Decision/Record of Decision will have to be moved from fiscal year 1996 into fiscal year 1995. The increase in fiscal year 1995 cost associated with the increase in scope will be approximately \$100,000. EG&G requests that DOE/RFFO provide written guidance to initiate the change control process for OU 15 including the following:

1. Support approval of an updated ER 2000 schedule for OU 15 (updated to reflect delays discussed above) to be formalized through the Baseline Change Control Process which meets original ER 2000 goals.
2. Fund increased OU 15 fiscal year 1995 scope as Management Reserve or Contingency until successful acceleration of OU 15 is proven.

EG&G is committed to continuous improvement of quality, schedule and cost and will work toward accelerating OU 15 in the most efficient manner possible. If you have any questions regarding this correspondence, please contact Dan Booco at extension 8549 or Dennis Schutte at extension 8709.



S. G. Stiger, Director
Environmental Restoration Program Division
EG&G Rocky Flats, Inc.

DAB:jlm

Orig. and 1 cc - J. M. Roberson

Attachment:
As Stated

cc:
D. George - DOE/RFFO
F. R. Lockhart - " "
M. N. Silverman - " "
J. D. Wienand - " "

OPERABLE UNIT 15 WORKING SCHEDULE ASSUMPTIONS

The following assumptions were developed with the concurrence of DOE/RFFO:

1. The regulatory agencies will meet the expedited review and comment periods.
2. The conclusion of the Colorado Department of Public Health and Environment (CDPHE) Letter Report supporting a No Action closure for OU 15 will be approved by the regulatory agencies.
3. The regulatory agencies will provide written approval of the CDPHE Letter Report for OU 15 allowing the Resource Conservation and Recovery Act (RCRA) closure certification to be based on the Final CDPHE Letter Report.
4. The regulatory agencies will review and comment on draft documents prior to receiving preceding final documents (return comments on Draft Proposed Plan prior to receiving Final RFI/RI Report).
5. The Administrative Record Review will be allowed to begin before the Final RCRA Facility Investigation/Remedial Investigation Report and Final Proposed Plan are approved.
6. All Administrative Records tasks will be completed and will not become part of the critical path.