

CORRES CONTROL
OUTGOING LTR NO

91 RF 4490

EG&G ROCKY FLATS

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

July 29, 1991

91-RF-4490

Robert M Nelson, Jr
Manager
DOE, RFO

Attn F R Lockhart

EXTENSION OF THE IAG MILESTONE DATE FOR THE WORK PLAN FOR CONTROL OF
RADIONUCLIDE LEVELS IN WATER DISCHARGES FROM ROCKY FLATS PLANT -
JMK-0398-91

EG&G Rocky Flats Environmental Management Department/Remediation Programs Division (EM/RPD) is in the process of responding to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) comments and revising the Work Plan for "Control of Radionuclide Levels in Water Discharges from the Rocky Flats Plant" (This Work Plan is required under Section XII of the IAG Statement of Work) As discussed with F R Lockhart on July 22, 1991, EG&G Rocky Flats recommends that DOE/RFO request a formal extension of the submittal deadline from the presently scheduled date of August 13, 1991, to September 20, 1991 No other schedule will be affected by this extension The reasons for this request are discussed in the following paragraphs.

The IAG Scope of Work required preparation of a "Discharge Limits for Radionuclides" Work Plan that assessed quality of water discharges, identified potential treatment technologies, and proposed analytical methodology for approval Comments by EPA and CDH on the draft Work Plan, which was submitted April 5, 1991, indicated the potential for major undefined expansions of the scope of this Plan Resolving these uncertainties could require significant changes in the focus and content of Section 4 (the proposed plan of work)

In addition, EPA and CDH comments also raised a number of technical issues that will require negotiation and additional time to resolve Several issues raised by the agencies are substantial and require major changes to the document Issues include

- Change focus substantially to describe special sampling plans, operating protocols, and analytical methods for controlling releases and assessing water quality,
- Expand discussion of treatment options, identify preferred treatment methods, and recommend treatment to be implemented,

REVIEWED FOR CLASSIFICATION/UCNI
By [Signature]
Date 9/20/91

ADMIN RECORD

A-SW-000070

DIST	LTH	ENC
BRETZKE, J C		
BURLINGAME, A H		
COFF, R D		
DOUCHER, D W		
JAVIS J G		
VI-RED J E	X	
ERRERA D W		
ERRIS L R		
RAIKOR, F J		
RANCIS, G E		
WOODWIN, R		
HEALY, T J		
DEKER, E H		
SENS, J P		
KEELE, P B		
ERSH, J M	X	
KIRBY W A		
KIRKEBO, J A		
EE, E M		
MAJESTIC, J R		
MATHEWS, T A		
MEURRENS, B E		
MORGAN, R V		
NORTH, P		
PALMER L A		
POTTER, G L		
PIZZUTO, V M		
BHOADES, J I	X	
SAFFELL, B F		
SWANSON, E R		
WIEBE, J S		
WILKINSON, B B		
WILLIAMS, R E		
WILSON, J M		
YOUNG, E R		
ZANE, J O		
Wheeler, J T	X	
Wheeler, T C	X	
Wheeler, R A	X	
Wheeler, W A	X	
Wheeler, K M	X	
Wheeler, F D	X	
CORRES CONTROL	X	X
TRAFFIC		

CLASSIFICATION	
UCNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE

DATE 7/26/91

IN REPLY TO LTR NO
None

PC#
LTR APPROVALS
JAK - A (For SW)
JCE - G (For SW)
JEE - G (For SW)
ORIG & TRF INITIALS
JTD PIF

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- Review, evaluate, and incorporate Standard Operating Procedures (SOPs) and development of Standard Operating Procedures Addenda (SOPAs), if appropriate, and
- Establish more detailed work plans and schedules

At the heart of the technical issues are analytical uncertainty and methodology, and treatment method development. These and other issues will require agency agreement on specific Work Plan elements before resubmittal of the revised Work Plan. EG&G Rocky Flats feels that an early meeting is necessary to resolve Work Plan approaches and to discuss remaining technical issues.

Our mutual objective is to arrive at a suitable plan of work to control radionuclide discharges from RFP. The IAG Scope of Work states that if development of technologies was necessary, the parties would negotiate modifications and schedules for the Work Plan. We believe that a schedule adjustment is appropriate.

The draft document was submitted to the agencies on April 5, 1991. Agency comments were received by EG&G Rocky Flats beginning on July 5, 1991, and as recently as July 22, 1991 from the EPA. Earlier this year, a schedule extension was granted for delivery of the draft Work Plan, but not for the final Work Plan, leaving EG&G Rocky Flats with only 17 days to produce and deliver the final Work Plan. Substantial issues raised by EPA/CDH comments will require the originally-scheduled Interagency Agreement (IAG) issue resolution and response time of 41 days, i.e., to September 20, 1991. EG&G requests renegotiation of the final Work Plan delivery date to September 20, 1991 (41 days) in order to accomplish issue resolution and allow effective incorporation of agency comments.

Please contact J. T. Ottensman at extension 3198 of Remediation Programs or K. M. Motyl at extension 4074 of Clean Water, if you have questions or desire additional discussion.



J. M. Kersh, Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats

JTO dmf

Orig and 4 cc - R. M. Nelson, Jr

cc

T. T. Olsen - DOE, RFO
J. Rampe - DOE, RFO