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March 27, 1991

APR 1 1991

Mr. Martin Hestmark
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

RE: REVIEW AND COMMENT, STANDARD OPERATING PROCEDURES
(SOP's) AND QUALITY ASSURANCE PROJECT PLAN (QAPjP), U.S.
DOE ROCKY FLATS PLANT, Draft Final Version, FEBRUARY, 1991

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed both of the above referenced documents submitted by DOE and its prime operating contractor, EG&G. The Division's comments are attached.

This version of the QAPjP and SOP's is an improvement over the previous version submitted in October, 1990. Based on this improvement, the Division recommends approval of the QAPjP. We have made some comments to this document and would like to see them incorporated in to the final version of the QAPjP, but our recommendation for approval is not conditional on this incorporation.

Regarding the SOP's, the Division has taken a different approach. The improvements to the SOP's have made many of them approvable in their present form. Others need changes, and a few have either a fatal flaw or a substantial need for additional or re-worked text. In the attached comments, we have indicated whether we have recommended approval, conditional approval, or have recommended rejection of the SOP. If we have recommended approval for an SOP, we consider the SOP to be useable now, but the incorporation of our comments may make the SOP more complete and less ambiguous to field crews. If conditional approval was recommended for an SOP, we consider addressing our comments mandatory. If the Division has recommended NOT approving an SOP, we feel there are major problems and/or shortcomings and that revision, expansion, and correction are necessary before approval can be recommended.

In addition, the Division feels that a mechanism should be developed between the regulatory agencies and DOE to address revisions and additions to the SOP's. We would propose that, on at least an annual basis, DOE be required to review all SOP's. This review could include an assessment of whether the SOP's deliver useable data, accurately describe field and analytical procedures in use at the plant, and cover all and/or new procedures in use. DOE could feel free to update or amend these SOP's more frequently, but the Division believes that the annual revision should be the minimum required.

There are several procedures in use or potentially in use at RFP the Division feels warrant an SOP. These include surveying and geophysical well logging. We propose that these SOP's be generated by DOE and EG&G by June 1, 1991 for review by EPA and the state.

If you have any questions regarding these matters, feel free to contact either Joe Schieffelin (331-4421) or Harlen Ainscough (331-4977) of my staff.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Fraser Lockhart, DOE
Tom Olsen, DOE
Tom Greengard, EG&G
Barbara Barry, RFP
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