

000005146

CORRES. CONTROL
OUTGOING LTR NO.

EG&G ROCKY FLATS

RF 0659

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

January 15, 1993

93-RF-0659

DIST.	LTR	ENC
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
COPP, R.D.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HILBIG, J.G.		
IDEKER, E.H.		
KERSH, J.M.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.	X	X
MARX, G.E.		
McDONALD, M.M.		
McKENNA, E.G.		
MCNTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RILEY, J.H.		
SANDLIN, N.B.		
SHEPHERD, R.I.		
STEWART, D.L.		
SULLIVAN, M.T.		
SWANSON, F.B.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.	X	
SMITH, TA		

R. J. Schassburger, Deputy Director
Environmental Restoration Division
DOE, RFO

RESPONSE TO R. I. GREENBERG MEMORANDUM TO J. K. HARTMAN ON EM-45 SELF-ASSESSMENT CORRECTIVE ACTION PLAN DATED SEPTEMBER 4, 1992 - RLB-007-93

The following responds to the above reference and provides a status of actions currently open and assignment of responsibility for the actions. (See attachment 1).

1.0 Responses to General Comments:

1. Transmittal memorandum states that this Corrective Action Plan (CAP) will be revised and schedules confirmed once the "transition plans" are approved. This is appropriate for those complex corrective actions involving both EG&G and DOE Rocky Flats (RF), however, it should not be the rationale for not establishing a complete plan and schedule for all the negative findings to the best ability now.

Response - All actions have been assigned an action date if not already completed. Also responsibilities have been assigned.

2. The corrective action plan should address real actions which can be implemented now with the understanding that as conditions change further actions can be taken. Additionally, the Corrective Action Plan should have been a collaborative effort. Much of the official response defines what the present situation is and defers initiating specific action until the "transition plan" is issued or it is stated that condition is out of EG&G scope. This approach loses sight of the fact that findings and concerns are based on existing requirements and objectives for the RF Environmental Restoration (ER) program. Work is continuing under these present objectives. Corrections to findings should be specifically addressed to meet those objectives. Although the "transition" will affect the organization and mission of ER, it can only be in an expanded role making the required Corrective Action Program more necessary to develop and implement as soon as possible.

Response - Short near-term actions are identified. Joint responses have been added and deferral to a transition plan eliminated.

3. Assessment findings should not be used as reasons for not taking action. The ER organizational immaturity is cited as the reason for not proposing specific actions to address the assessment findings and observations. This is not acceptable, until the identified problems are faced and corrective measures planned in detail, implemented, and monitored, the ER program will continue to be immature.

Schmidt, D.D. X X

Fisher, P.L. X

CORRES CONTROL	X	X
Admin. Rec.	X	
ERM Track'g		

CLASSIFICATION:

UCNI	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER SIGNATURE
DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE

IN REPLY TO RFP CC NO:

ON ITEM STATUS
 OPEN CLOSED
 PARTIAL
LTR APPROVALS:

ORIG & TYPIST INITIALS
RLB:ly
RF-6569 (Rev. 5/92)

ADMIN RECORD A-SW-000800

REVIEWED FOR CLASSIFICATION/UCNI
By *B.M. Hoffman WNA*
Date *8-25-93*

Response - ER organization immaturity is eliminated as a restraint to action plan and specified action defined where appropriate.

4. The "Executive Summary" of this corrective action plan should have addressed the "six areas of investigation" and/or the "four general areas" listed in the ER Program Assessment Report, executive summary. In addition, those areas where EG&G requires support and guidance, RF should have indicated a planned approach and timing to "jointly" develop corrective actions as appropriate.

Response - We agree with the comment and will use this format on succeeding assessment responses.

5. A Corrective Action Plan should be designed in content and format in such a way that it will facilitate the follow-up on the actions. The content and format of this CAP will make it difficult to conduct follow-up and verification of correction to the findings.

Response - Comment is noted for future assessment responses. With the addition of a Quality Assurance (QA) organization to the Environmental Restoration Management (ERM) organization, assessment responses will be structured.

2.0 Responses to Specific Comments:

1. The authority for actions should be conveyed by a signature of responsible persons. There are no signatures on the "corrective action plan" report. It is unclear, who is the responsible person making the corrective action commitments. Who is the designated EG&G and/or RF contact assuring completion of the corrective actions?

Response - We are not in total agreement with this comment. The Manager of Environmental Restoration management and the Quality Assurance management signatures are sufficient to commit ER staff. Assignment of actions does not require ER staff approval. An assignment list is provided due to the new ER organization structure. Update to the status section will be performed each month until all actions are closed.

2. Response Finding 1-1-001. All reference materials critical to the responses should be attached to the CAP. Reference is made to various sections in an attachment. EM-453 does not have the "attachment."

Response - Attachment will be provided.

R. J. Schassburger

January 15, 1993

93-RF-0659

Page 3

3. Response Finding 1-1-002. One of the key suggestions related to this finding was the need to create a "Roles and Responsibilities" matrix to aid in internal communication to support everyday on-going activity. This should have been addressed but was not.

Response - We agree with this comment. DOE-HQ, DOE-RFO and EG&G RF roles and responsibilities should be clarified by February 1st with the completion of the ER PMP, PP, MP as part of the implementation of 4700.1.

4. Response Finding 1-1-007. Since resistance to required procedures and programs is stated in the Corrective Actions Plan as being a problem, then corrective action should include higher management mandated indoctrination and retraining in the established organizational systems.

Response - The corrective action plan appears to have caused some confusion. All organization staff supporting ER efforts, if working under ERM procedures, are trained and comply to these procedures. Coordination and development of the ER Quality program and review of this program by the Site QA organization has caused some interface problems. With the establishment of ER specific QA organization and the assignment of a QA manager interface problems have been eliminated.

5. Response Finding 1-3-023. The importance associated with having certified, usable, verifiable SOPs should not be underestimated. The people using these SOPs, in whatever capacity, should be qualified and trained. There was no plan or schedule given for revising the "peer level" procedures.

Response - A date will be established for completion of the revision of the SOPs.



R. L. Benedetti
Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

RLB:lj

Attachments:
As Stated