

91 RF 2266

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DIST.	LTR	ENC
TZK, I.C.		
UN, E.A.H.		
IP, R.		
UCHER, D.W.		
IS, J.G.		
RED, J.E.	X	
RERA, D.W.		
RIS, L.R.		
KOR, F.J.		
NCIS, G.E.		
DWIN, R.		
LY, T.J.		
EB, E.H.		
S, J. P.		
LE, P. B.		
SH, J.M.	X	
Y, W.A.		
EB, J.A.		
EM		
ESTIC, J.R.		
HEWS, T.A.		
JRRENS, B.E.		
GAN, R.V.	X	
ITH, P.		
MER, L.A.		
TER, G.L.	X	
ITO, V.M.		
ADES, J.I.		
PELL, R.E.		
INSON, E.B.		
BE, J.S.		
KINSON, R.B.		
LIMS, R. E.		
SON, J. M.		
NG, E.R.		
E, J.O.		
3. [unclear]	X	
S. BUSBY	X	
S. FOLGER	X	
J. LANGRISH	X	
PORTER	X	
L. SMITH	X	
RES CONTROL	X	X
FFIC		

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91-RF-2266

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: F. Lockhart

DOE COMMENTS ON STANDARD OPERATING PROCEDURES (1753) - JEE-0011-91

Environmental Management (EM) has reviewed your comments on the following Standard Operating Procedures (SOP's):

- Field Operations
- Groundwater
- Geotechnical
- Surface Water
- Ecology

The first four volumes previously reviewed by DOE are Draft Finals that have already been sent to CDH and EPA. DOE's comments related to these volumes will be incorporated in any future editions of these SOP's. The comments concerning the Draft Ecology SOP's will be incorporated along with CDH and EPA's comments in the Draft Final Ecology SOP's.

General requests for Health and Safety Plans (HASPs), Work Plans, and Quality Assurance Project Program Plans (QAPjPs) as well as the need for OSHA 40-hour training were repeated throughout all of the volumes. These documents are listed in the Inter-Agency Agreement (IAG) and have been, or will be, prepared according to the IAG schedule. OSHA 40-hour training is the minimum training required for EG&G/EM and subcontractor personnel. Additional training such as Supervisor, Radiation, and SOP training has already been discussed in the HASPs and SOP's and is taking place now in preparation for EM field activities scheduled to start May 1, 1991.

The specific comments about Ecology were discussed in a meeting among EMAD, RPD, and JOE March 22, 1991. As a result of the meeting, it was determined that the comments related to Ecology were not technical or related to the SOP's, but rather concerned the Ecology sections of the Work Plans for Operable Units (OU's) 5 and 6 and are being addressed by RPD.

In summary and counter to the general tone of the DOE cover letter is the statement that has been implanted throughout DOE's comments:

"All of the SOPs in these volumes appear to be technically correct and describe appropriate methods for gathering the data in question."

CLASSIFICATION:

UNCLASSIFIED

CONFIDENTIAL

SECRET

HORIZED CLASSIFIER SIGNATURE

DATE 1/29/92

REPLY TO LTR NO.

APPROVALS:

WG/cak

EG & TYPIST INITIALS

DOCUMENT CLASSIFICATION
REVIEW W/AVER PER
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R. M. Nelson, Jr.

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EG&G/EM's assessment is that this quote describes the true nature of the SOP's which EM believes are well written documents that have been submitted in accordance with the schedule listed in the IAG.



J. E. Evered, Director
Environmental Management
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JWL:csk

Orig. and 1 cc - R. M. Nelson, Jr.