

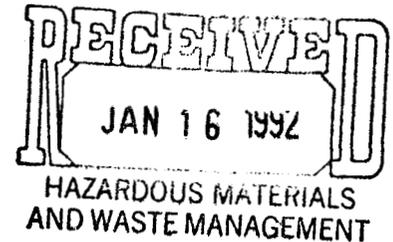


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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

JAN 15 1992



Ref: 8HWM-FF

Mr. Fraser Lockhart
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

re: Review/Approvals of SOPs/DCNs

Dear Mr. Lockhart:

We would like to document the concerns expressed in several recent meetings over the review/approval status and processes for the Standard Operating Procedures (SOPs). Please reference our previous letters on this issue for background information (March 29 and August 1, 1991). The problems expressed in this previous correspondence regarding DOE's failure to provide an adequate explanation of SOP submittals have not only persisted, but continue to worsen.

In November, 1991, discussions among our respective staffs indicated that the EG&G Quality Assurance office had abandoned what we understood to be an agreed-upon process for documenting and changing procedures, and directed that SOPs and Work Plans would henceforth be changed unilaterally through issuance of internal Document Change Notices (DCNs). We expressed our dismay over this process and were told this was not the intent of QA procedural changes, and that Standard Operating Procedure Addenda (SOPAs) and Technical Memoranda would continue to be employed as appropriate to document changes in SOPs and Work Plans as necessary for inclusion in the Administrative Records.

In December 1991, we received yet another set of SOPs. Again, no explanation was provided as to what changes had been made, or why, or how any alterations were related to previous regulatory agency comments, most of which remain outstanding. More disturbing still was the fact that numerous SOPs which we had approved have apparently been changed in the interim through issuance of internal DCNs; none of these were submitted for review before being implemented.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD

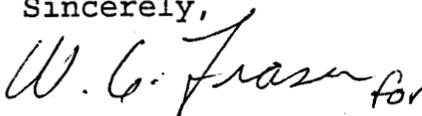
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Thus, it appears that considerable confusion remains over what procedures have been reviewed and approved, and how necessary changes and adjustments to SOPs and Work Plans are to be made. Discussions with CDH staff indicate they share our assessment of this situation. We fully recognize the need for documentation procedures which offer a degree of flexibility necessary to accommodate changes as field conditions and technical advances dictate. EPA and CDH would like to play an active role in this process, and cannot do so without your cooperation. We therefore request an opportunity to discuss this matter with you and appropriate staff, in order to establish the current status of procedural documentation and confirm the methods by which changes and updates will be made.

To initiate further discussion of these issues, please contact Bill Fraser (EPA) at 294-1081.

Sincerely,

A handwritten signature in cursive script that reads "W. G. Fraser" followed by a small "for" written below the end of the signature.

Martin Hestmark, (EPA)
Manager, Rocky Flats Program

cc: Barbara Barry, CDH
Gary Baughman, CDH
Scott Grace, DOE
Erich Evered, EG&G