

INTEROFFICE CORRESPONDENCE

DATE July 28, 1993

TO W S Busby, Remediation Project Management, Bldg 080, X8522

FROM K Bentzen, Environmental Quality Support, Bldg 080, X8753 *KB*

SUBJECT ERM DEFICIENCY FOLLOW-UP/VALIDATION - KB-059-93

ACTION Corrective Action Responses to below listed Deficiency Reports to Steve Chestnut, Acting Manager, ERM Self-Evaluation, on or before Close of Business 08/20/93

As a result of a Corrective Action Request (CAR-92-080) issued to ERM by Assurance Audits, and DOE RFO/SR L1-002-03 that identifies a lack of formal following and closure of ERM identified deficiencies, Environmental Quality Support (EQS) is in the process of following up and validating deficiencies and observations generated from past inspection reports. This follow-up encompasses all deficiencies/observations generated since May 1991 and the objectives are to 1) validate, follow-up, and properly resolve all quality issues from the previous inspection reports, surveillance reports, and readiness reviews, 2) screen out those issues that are not quality issues and provide justification, 3) identify global areas of deficiencies for trending information.

To date, EQS has identified the following Deficiency Reports that have made it through the initial screening process and therefore, require corrective action and/or justification for closure.

- | | |
|--------------|------------|
| EQS/93-030 | EQS/93-155 |
| EQS/93-083 ✓ | EQS/93-156 |
| EQS/93-085 | EQS/93-180 |
| EQS/93-094 ✓ | EQS/93-187 |
| EQS/93-095 ✓ | EQS/93-188 |
| EQS/93-112 ✓ | EQS/93-191 |
| EQS/93-120 | EQS/93-196 |
| EQS/93-121 | EQS/93-197 |
| EQS/93-146 | EQS/93-209 |
| EQS/93-153 | EQS/93-210 |
| EQS/93-154 | |



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Please review the attached twenty-two (Attachment 1) DR's and provide the following information

- If corrective action is required, then complete the Corrective Action Block of the DR This should include the cause of condition, corrective action plan, the scheduled completion date and all required signatures
- If however, it is your position that the DR identifies a problem that has already been corrected or the information is inaccurate, a meeting should be held with Steve Chestnut, Acting Project Manager, ERM Self Evaluation, X6901, to resolve the issue and close the DR appropriately

By procedure (1-50000-ADM-16 17, Deficiency Reporting System), a response is required that identifies a corrective action plan Please be aware that this response does not have to be the implementation date Reasonable schedules for implementation should be based upon the risk involved and should be documented in the "Scheduled Completion Date" block of the DR form

The responses must be submitted to EQS no later than COB **August 20, 1993** and if you have any questions please contact Steve Chestnut, X6901 Thank you

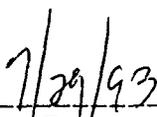
SDC dms

Attachments
As Stated (1)

cc
N M Hutchins (w/o Attachments)
ERM Records Center (2)

ACKNOWLEDGEMENT OF RECEIPT


W S Busby
Remediation Project Management


Date

DEFICIENCY REPORT

		Audit/Surveillance #	<input type="text" value="N/A"/>	DR Number:	<input type="text" value="EQS-93-156"/>
Product	<input type="checkbox"/>	Contractor/Supplier	<input type="text" value="EG&G"/>	Response Organization	<input type="text" value="EG&G - ERM/RPM"/>
Other	<input checked="" type="checkbox"/>	Job(Program) #	<input type="text" value="N/A"/>	Responsible Manager	<input type="text" value="W.S. Busby"/>
					Page <input type="text" value="1"/> of <input type="text" value="2"/>
					Bldg <input type="text" value="OU-3"/>

Deficiency Block

Governing Document(s) <input type="text" value="RFP Environmental Management Site-Wide QA Project Plan (QAP)P, Rev 0), May 7, 1991"/>	
Requirement(s) <input type="text" value="See page 2 of 2 for Requirement"/>	
Description of Finding <input type="text" value="See page 2 of 2 for Description of Finding"/>	Discrepancy Code <input type="text" value="DES-01"/> QR Trend Code <input type="text" value="2.5"/>
<input type="text" value="for T.G. Barbour"/>	<input type="text" value="04678"/> <input type="text" value="15/07/93"/> <input type="text" value="Approval"/> <input type="text" value="515570"/> <input type="text" value="07/15/93"/>
Originator/Organization	Employee # Date Approval Employee # Date

Corrective Action Block

Cause	Response Due Date	<input type="text" value="8.20.93"/>	Cause Code	<input type="text"/>
Corrective Action (C.A.)				
C.A. Person/Organization	Employee #	Date		
→				
<input type="text" value="Scheduled Completion Date"/>	Originator Concurrence	Employee #	Date	

Close Out Block

Verification of Corrective Action					
Verifier/Organization	Employee #	Date	Closure Approval	Employee #	Date

DEFICIENCY REPORT CONTINUATION PAGE

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DR No. EQS-93-156

Requirement 1

IAG, Attachment 2, Section III, Health and Safety Plan (HSP) states in part

"DOE shall submit a HSP which will document specific health and safety procedures to be followed ensuring the health and safety of the investigative team and others (including the general public) during all phases of response actions "

"The HSP shall be submitted by DOE to EPA and the state for review and comment, within 30 days of the effective date of this Agreement "

Requirement 2:

QAPJP, RO, section 2.0, page 11, paragraph 1 states:

Site safety training, consistent with the requirements found in the Site Health and Safety Plan, shall be conducted Project participants who perform activities for this project shall be trained in the applicable safety procedures.

Description of Finding for Requirements 1 and 2

The following deficiency was noted during a readiness review conducted by M. Brooks and D. Dahl on May 15, 1992 (memo from L. McInroy to F. Hobbs, attn. M. Guillaume (May 18, 1992)). Also in attendance was M Guillaume (OU-3 RFI/RI Project Manager).

No OU-3 site-specific Health and Safety Plan has currently been prepared

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DEFICIENCY REPORT

		Audit/Surveillance #	<input type="text" value="N/A"/>	DR Number:	<input type="text" value="EQS-93-155"/>
Product	<input type="checkbox"/> Contractor/Supplier	<input type="text" value="EG&G"/>	Response Organization	<input type="text" value="EG&G - ERM/RPM"/>	Page <input type="text" value="1"/> of <input type="text" value="2"/>
Other	<input checked="" type="checkbox"/>	Job(Program) #	<input type="text" value="N/A"/>	Responsible Manager	<input type="text" value="WS Busby"/> Bldg <input type="text" value="OU-3"/>

Deficiency Block

Governing Document(s)

Requirement(s)

Description of Finding

Discrepancy Code QR Trend Code

<i>Ratha Randall for</i>					
<u>T G Barbour</u>	<u>04678</u>	<u>07/15/93</u>	<u><i>[Signature]</i></u>	<u>515570</u>	<u>07/16/93</u>
Originator/Organization	Employee #	Date	Approval	Employee #	Date

Corrective Action Block

Cause

Response Due Date Cause Code

Corrective Action (C.A.)

<u>C.A Person/Organization</u>	<u>Employee #</u>	<u>Date</u>	
<u>Scheduled Completion Date</u>	<u>Originator Concurrence</u>	<u>Employee #</u>	<u>Date</u>

Close Out Block

Verification of Corrective Action

<u>Verifier/Organization</u>	<u>Employee #</u>	<u>Date</u>	<u>Closure Approval</u>	<u>Employee #</u>	<u>Date</u>
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DEFICIENCY REPORT CONTINUATION PAGE

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DR No. EQS-93-155

Requirement

IAG, Part 18, Section 125 states "DOE shall notify the state and EPA in writing of any permits required for off-site activities related to this Agreement as soon as DOE becomes aware of the requirement Upon request, DOE shall provide the state and EPA with copies of all such permit applications and other documents related to the permit process "

Description of Finding:

The following deficiency was noted during a readiness review conducted by M. Brooks and D. Dahl on May 15, 1992 (memo from L. McInroy to F. Hobbs, attn: M. Guillaume)). Also in attendance was M. Guillaume (OU-3 RFI/RI Project Manager).

Use Permits, required to enter private land for sampling purposes, have not been obtained before initiating the impacted activities.

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DEFICIENCY REPORT

		Audit/Surveillance #	N/A	DR Number:	EQS-93-154
		Product <input type="checkbox"/>	Contractor/Supplier	EG&G	Response Organization
Other <input checked="" type="checkbox"/>	Job(Program) #	N/A	Responsible Manager	W S Busby	Bldg OU-3

Deficiency Block

Governing Document(s) RFP Environmental Management Site-Wide QA Project Plan (QAPJP, Rev 0), May 7, 1991					
Requirement(s) See page 2 of 2 for Requirement					
Description of Finding See page 2 of 2 for Description of Finding				Discrepancy Code	DES-01
				QR Trend Code	38
<i>Bocho Randall</i> for T G Barbour		04678	07/19/93	 Approval	515570
Originator/Organization	Employee #	Date	Date	Employee #	Date

Corrective Action Block

Cause	Response Due Date		Cause Code	
Corrective Action (C.A.)				
C.A. Person/Organization	Employee #	Date		
Scheduled Completion Date	Originator Concurrence	Employee #	Date	

Close Out Block

Verification of Corrective Action					
Verifier/Organization	Employee #	Date	Closure Approval	Employee #	Date

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ORIGINAL

DEFICIENCY REPORT CONTINUATION PAGE

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DR No EQS-93-154

Requirement

IAG, Part 18, Section 122 states "When DOE proposes a response action to be conducted entirely on the Rocky Flats Site which in the absence of CERCLA Section 12(c)(1) and the NCP would require a Federal or State permit, DOE shall include in the submittal

- A Identification of each permit which would otherwise be required
- B Identification of the standards, requirements, criteria, or limitations which would have had to have been met to obtain each new permit
- C Explanation of how the response action proposed will meet the standards, requirements, criteria, or limitations identified in subparagraph 122(B) immediately above "

Description of Finding

The following deficiency was noted during a readiness review conducted by M. Brooks and D Dahl on May 15, 1992 (memo from L McInroy to F. Hobbs, attn M Guillaume (May 18, 1992)) Also in attendance was M. Guillaume (OU-3 RFI/RI Project Manager)

State of Colorado well drilling permits have not been obtained

ORIGINAL

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DEFICIENCY REPORT

		Audit/Surveillance #	N/A	DR Number:	EQS-93-153
		Product	<input type="checkbox"/> Contractor/Supplier	EG&G	Response Organization
Other	<input checked="" type="checkbox"/>	Job(Program) #	N/A	Responsible Manager	W S Busby
					Page 1 of 2
					Bldg OU-3

Deficiency Block

Governing Document(s)		RFP Environmental Management Site-Wide QA Project Plan (QAP/P, Rev 0), May 7, 1991							
Requirement(s)									
See page 2 of 2 for Requirement									
Description of Finding		Discrepancy Code		QR Trend Code					
See page 2 of 2 for Description of Finding		DES-01		38					
<i>Gatha Randall for</i> TG Barbour		04678	07/15/93	 Approval	515570	07/16/93			
Originator/Organization		Employee #		Date		Employee #		Date	

Corrective Action Block

Cause		Response Due Date		8-20-93		Cause Code			
Corrective Action (C.A.)									
C.A. Person/Organization		Employee #		Date					
Scheduled Completion Date				Originator Concurrence		Employee #		Date	

Close Out Block

Verification of Corrective Action											
Verifier/Organization		Employee #		Date		Closure Approval		Employee #		Date	

DEFICIENCY REPORT CONTINUATION PAGE

Page 2 of 2

DR No EQS-93-153

Requirement

IAG, Part 18, Section 122 states "When DOE proposes a response action to be conducted entirely on the Rocky Flats Site which in the absence of CERCLA Section 12(c)(1) and the NCP would require a Federal or State permit, DOE shall include in the submittal

- A Identification of each permit which would otherwise be required
- B Identification of the standards, requirements, criteria, or limitations which would have had to have been met to obtain each new permit
- C Explanation of how the response action proposed will meet the standards, requirements, criteria, or limitations identified in subparagraph 122(B) immediately above "

Description of Finding:

The following deficiency was noted during a readiness review conducted by M Brooks and D Dahl on May 15, 1992 (memo from L McInroy to F Hobbs, attn. M. Guillaume (May 18, 1992)). Also in attendance was M. Guillaume (OU-3 RFI/RI Project Manager).

The State permit for Small Mammal Trapping has not been obtained.

DEFICIENCY REPORT

		Audit/Surveillance #	N/A	DR Number:	EQS-93-146
		Product <input type="checkbox"/>	Contractor/Supplier	EG&G	Response Organization
Other <input checked="" type="checkbox"/>	Job(Program) #	N/A	Responsible Manager	W S Busby	Bldg <input type="text" value="OU-3"/>

Deficiency Block

Governing Document(s) RFP Environmental Management Site-Wide QA Project Plan (QAPJP, Rev 0), May 7, 1991

Requirement(s)

See page 2 of 2 for Requirement

Description of Finding

Discrepancy Code

QAP-09

QR Trend Code

25

See page 2 of 2 for Description of Finding

<i>Rocha Randall</i>					
for T G Barbour	04678	07/15/93	<i>[Signature]</i>	515570	07/15/93
Originator/Organization	Employee #	Date	Approval	Employee #	Date

Corrective Action Block

Cause	Response Due Date	8-20-93	Cause Code:	
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Corrective Action (C.A.)

C.A. Person/Organization Employee # Date

Scheduled Completion Date

Originator Concurrence Employee # Date

Close Out Block

Verification of Corrective Action

Verifier/Organization Employee # Date Closure Approval Employee # Date

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DEFICIENCY REPORT CONTINUATION PAGE

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DR No EQS-93-146

Requirement 1.

QAPJP, R0, section 2.0, page 9, paragraph 5 states.

EM Department and subcontractor personnel conducting environmental restoration (ER) field activities are required to complete the OSHA 40-hour Hazardous Waste Site Worker Safety Training and the annual OSHA 8-hour Hazardous Waste Site Worker Safety Refresher course required by 29 CFR 1910.120.

Requirement 2:

QAPJP, R0, section 2.0, page 9, paragraph 5 states

Personnel directly supervising hazardous waste site workers are required to complete the OSHA 8-hour Hazardous Waste Site Supervisor Safety course

Description of Finding for Requirement 1 and 2.

The following deficiency was noted during a readiness review conducted by M Brooks and D Dahl on May 15, 1992 (memo from L. McInroy to F. Hobbs, attn M. Guillaume (May 18, 1992)) Also in attendance was M Guillaume (OU-3 RFI/RI Project Manager).

The OU-3 RFI/RI Project Manager has not obtained documented evidence of OSHA training for all field personnel

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