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DIST.	Un	es
AMARAL, M.E.		
BURLINGAME, A.H.	X	
BUSBY, W.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
DAVIS, J.G.		
FERRERA, J.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
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HEDRHL, T.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MARX, G.E.		
MCDONALD, M.M.		
McKENNA, F.G.		
MONTHOSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
RIZZUTO, V.M.		
RISING, T.L.		
RODOLIN, N.B.		
WARTZ, J.K.		
SETLOCK, G.H.		
STEWART, J.L.		
STIGER, J.G.	X	
TCCIN, P.H.		
WCOBHEIS, J.M.		
WILSON, J.M.		
STELMACH, M.	X	
TYLER, L.L.	X	
BENTZEN, K.	X	
Ullman, D.L.	X	

March 1, 1995

Jessie M. Roberson
Assistant Manager for
Environmental Restoration
DOE/RFPO



95-RF-0

ADMINISTRATIVE RECORD (AR) FILES FOR COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT RESPONSE ACTIONS MANAGE OUTSIDE OF THE ENVIRONMENTAL RESTORATION PROGRAM DIVISION - SGS-06

Action: None required.

The January 22, 1991 Rocky Flats Interagency Agreement required that the Department of Energy establish and maintain an AR in accordance with § 113(k) of Comprehensive Environmental Response, Compensation, and Liability Act (Part 44, §231). The Interagency Agreement further states that the master copy of the AR shall be maintained in the Environmental Restoration Department (now the Environmental Restoration Program Division). The authority to manage the AR Program was delegated to EG&G Rocky Flats, Inc. on January 2, 1990.

Since its inception, the AR Program has been managed specifically to support Comprehensive Environmental Response, Compensation, and Liability Act response actions under the purview of the Environmental Restoration Program Division. We now have a situation involving two Comprehensive Environmental Response, Compensation, and Liability Act response actions requiring AR support which fall outside the designed scope of the present AR Program. The immediate action is the Interim Measure/ Interim Remedial Action drafted as a component of the National Conversion Pilot Project. This action is being undertaken by the Manufacturing Science Corporation, which has been contracted directly by the Department of Energy. The availability of an AR for this Interim Measure/Interim Remedial Action was announced in a public notice issued by the Colorado Department of Public Health and Environment. At the time of issuance, there was no AR available. The Environmental Restoration Program Division AR Program has received copies of the AR files for the National Conversion Pilot Project which will be distributed to the public repositories.

The second action of concern is the Pond Water Management Interim Measure/Interim Remedial Action drafted by Surface Water, with Environment, Safety, and Health as the Department of Energy oversight. The core Pond Water Management documents have been included in the files for Operable Units 5 and 6, but there is currently no separate AR file in support of Pond Water Management.

Our concern goes beyond these two individual actions. There is a very real potential for much of the current Decontamination and Decommissioning activities to fall under the umbrella of Comprehensive Environmental Response, Compensation, and Liability Act and subsequent actions require the support of an AR. As with the two Comprehensive Environmental Response, Compensation, and Liability Act actions described above, future activities may be under the direction of different organizations and separate contractors. We feel it is prudent to determine now what type of AR support will be provided to the Rocky Flats Environmental Technology as a whole.

It is our opinion that there should be an AR Program to manage and distribute AR files for all Rocky Flats Environmental Technology Site Comprehensive Environmental Response, Compensation, and Liability Act actions. The reasons for a central AR Program are as follows

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SIGNATURE
DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE
DATE

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS
3 PARTIAL OPEN
3 CLOSED
LTR APPROVALS

Best Available Copy

ADMIN RECORD

SW-A-004533

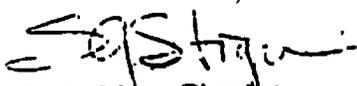
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- Uniform indexing and presentation of documents. There is a potential for documents to be distributed as hard copy, microfilm, microfiche, or electronic images. It would be very confusing for the public to be faced with a multitude of AR files all in different formats with different indexes.
- Prevention of unnecessary duplication of documents. Many documents such as the Historical Release Report are placed in a site wide AR file which supports all AR files.
- Better utilization of expertise. The existing AR Program staff has knowledge of Comprehensive Environmental Response, Compensation, and Liability Act AR requirements and Rocky Flats Environmental Technology Site history. It would be inefficient to have multiple AR programs which would require training staff unfamiliar with Rocky Flats Environmental Technology Site history or AR requirements.
- Better security and control. The Environmental Restoration Program Division AR files are housed in an access-controlled environment under established procedures to ensure their protection.

Expanding the scope of the Environmental Restoration Program Division AR Program will necessitate modifications. Our current staffing levels are based on the current Environmental Restoration Program Division Operable Unit activities. Anything beyond this anticipated level of support will require additional funding. With the possibility of separate contractors the issue of funding may be complicated. In addition, the collection of necessary documents from other organizations and contractors will be difficult without proper procedures in place.

Until we receive further direction, we can provide only limited support to organizations outside of the Environmental Restoration Program Division that require ARs. This support will include consultation on how AR files should be compiled and maintained, and the offer to store AR files in the Interlocken facility along with the Environmental Restoration Program Division AR files. In the case of the National Conversion Pilot Project, we will be distributing their AR files to the public repositories because of the need for immediate public access.

Please direct any comments or questions to Michael Stelmach, AR Coordinator, at extension 8503 or digital page 5905.



S. G. Stiger, Director
Environmental Restoration Program Division
EG&G Rocky Flats, Inc.

JMS:clh

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