

93 RF 6740



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

June 1, 1993

93-RF-6740

J. K. Hartman  
Assistant Manager for Transition  
and Environmental Restoration  
DOE, RFO

Attn: R. H. Birk

MILESTONE SCHEDULE AND EXTENSION REQUEST FOR OPERABLE UNIT NO. 3 -  
RLB-261-93

Ref: M. B. Arndt ltr, MBA-028-93, to R. J. Schassburger, Milestone Schedule for Operable Unit  
No. 3, March 12, 1993

This letter is to update the status of the OU 3 RCRA Facilities Investigation/Remedial Investigation (RFI/RI) Report schedule and request an extension for the Interagency Agreement (IAG) Table 6 milestone for the Remedial Investigation Report for Operable Unit (OU) 3. The above-referenced letter to DOE/RFO itemized the delays that negatively effected the OU 3 RI schedule during FY 92/93. On final analysis of the schedule impacts, three significant factors currently control the OU 3 schedule. An explanation of these factors and the IAG extension category as defined in Part 42 of the Interagency Agreement (IAG) follows:

1) Historical Schedule Impacts

Two events delayed approval of the Work Plan from November 1991 to March 1992. A schedule extension was granted for the Draft Work Plan in February 1991 without extending downstream milestones and a third review period was needed to complete the document. The original IAG scheduled 416 days from regulatory agency approval of the Work Plan to submittal of the Draft RI Report. When this duration is added to the actual approval of the Work Plan, the submittal date for the Draft RI Report would be October 13, 1993. This date would have been a reasonable milestone if no other factors had effected the schedule. This schedule extension is based on "good cause" as defined in the IAG, paragraph 222 D, "A delay caused, or which is likely to be caused, by the grant of an extension in regard to another timetable and deadline or schedule".

2) Access Permits

The OU 3 Project has been reporting difficulties in obtaining offsite access since the first offsite agreement was negotiated. The IAG scheduled 21 days for obtaining permits to conduct field work. This time period was grossly inadequate to complete the task. Field work was interrupted several times due to lack of necessary access agreements with the landowners. Agreements have been difficult to obtain due to owners' concerns over potential impacts from RFP, uncertainty in the investigation results, and liability issues. Many key landowners required several months to negotiate agreements through legal counsel. This schedule extension is based on "good cause" as defined in the IAG, paragraph 222 E, "Any other event or series of events mutually agreed to by the Parties as constituting good cause".

DIST.	LTR	ENC
BENEDETTI, R.L.	X	
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HARMAN, L. K.		
HEALY, T.J.		
HEDAHL, T.		
HILBIG, J.G.		
IDEKER, E.H.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.	X	X
MARX, G.E.		
MCDONALD, M.M.		
MCKENNA, F.G.		
MONROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RILEY, J.H.		
SANDLIN, N.B.		
SHEPLER, R.I.		
STEWART, D.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.	X	X
WILLIAMS, S. (ORC)		
WILSON, J. M.		
ZANE, J. O.		
Guillaume, M.	X	X
Bushy, WS	X	X

Braks, MC	X	X
ERM Tracking	X	
OU 3 File	X	X
CORRES CONTROL	X	X
TRAFFIC		
Admin. Rec.	X	X

CLASSIFICATION:

UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER  
SIGNATURE  
DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE  
DATE

IN REPLY TO RFP CC NO:

N/A

ACTION ITEM STATUS

OPEN  CLOSED

PARTIAL

LTR APPROVALS

WSB: [Signature]

ORIG & TYPIST INITIALS

MG/Jan

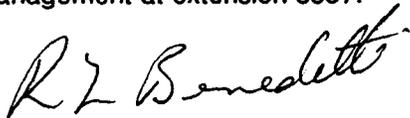
3) Coordination with the OU 2 Draft RI Report

The most important contamination effecting OU 3 is resuspended soil from the 903 pad. The evaluation of 903 pad-derived contamination in OU 2 is of vital concern in our ability to evaluate the nature and extent of contamination in OU 3. The results of kriging OU 2 surface soil contamination data has a direct effect on our ability to explain the technical "story" of OU 3 contamination. The OU 3 field sampling plan was developed based on continuation of the OU 2 soil sampling plan across Indiana Street into OU 3. Thus the assessment of OU 3 soil contamination requires completion of the OU 2 study. This critical information from the OU 2 RI Report will not be available until November 1993. The first internal report on OU 2 soils will not have a completed internal review until November 1, 1993. The OU 3 soil evaluation can only proceed after this assessment is complete. The inclusion of the OU 2 soils evaluation is technically integral to the OU 3 RI Report; thus, falls under the "good cause" extension request as defined in the IAG, paragraph 222 E, "Any other event or series of events mutually agreed to by the Parties as constituting good cause".

The potential for missed OU 3 milestones has been discussed at various times with Bob Birk of your staff, OU 3 Project Managers with EPA and CDH, and was also discussed at the recent DOE/RFO and DOE/HQ FY 93 mid-year review.

We have also identified 6 assumptions, Attachment 1, that provide the basis for the Draft RI Report schedule. Also included in Attachment 2, is the working schedule for completion of the draft report. Based on this schedule, the Draft RI Report will be delivered to EPA/CDH on February 14, 1994. Also, the date for submittal of the Final RI Report will be extended to October 21, 1994 (schedule found in Attachment 3).

If you have any questions concerning this issue, please call M. Guillaume of Remediation Project Management at extension 8557.



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

MG:dmf

Orig. and 1 cc - J. K. Hartman

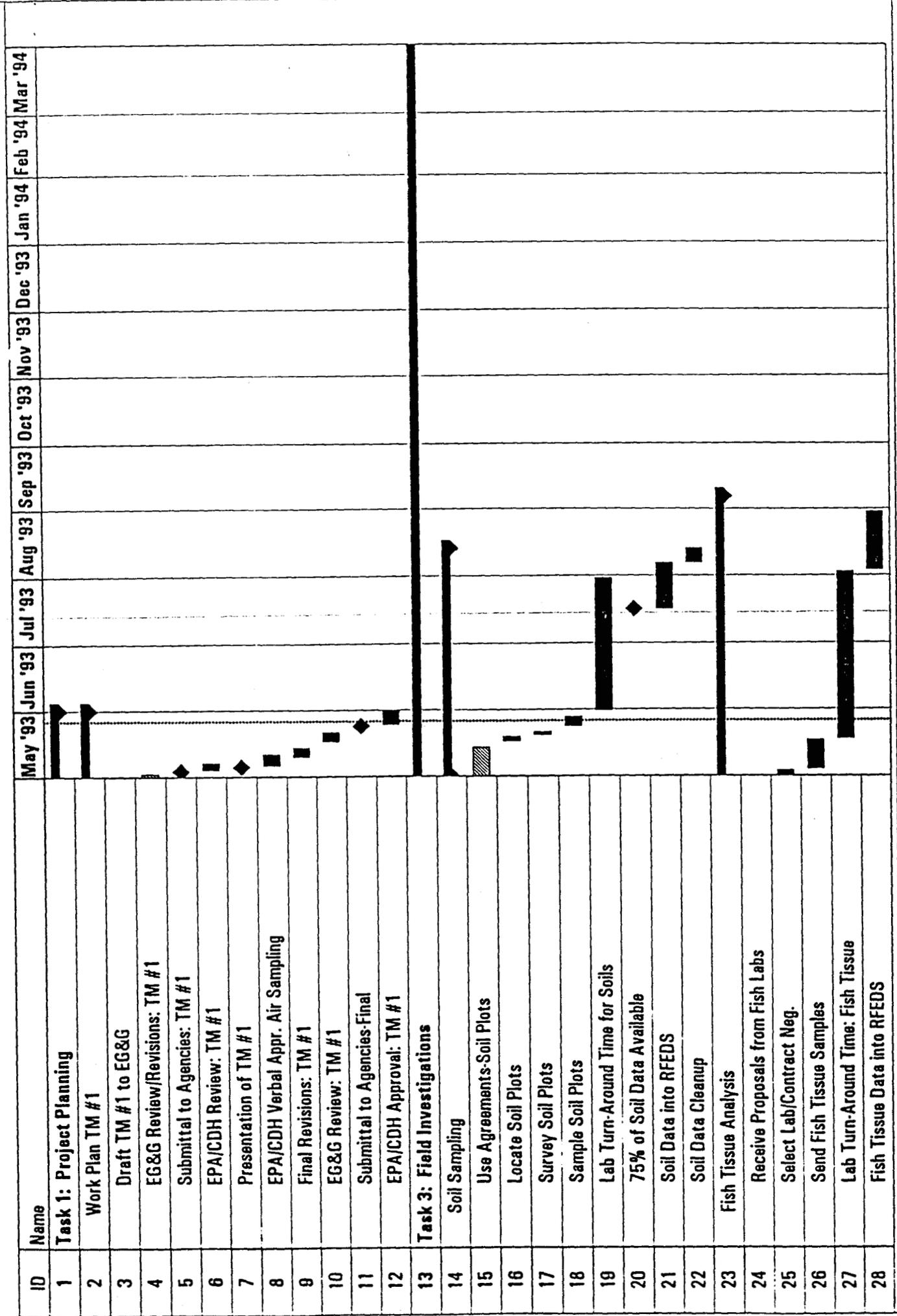
## Attachment 1

Attachment 1  
93-RF-6740  
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### OU 3 RI REPORT SCHEDULE ASSUMPTIONS May 1993

1. There will be no additional cost or scope impacts from current negotiations on the OU 1 RI Report. OU 1 negotiations will be concluded in a timely manner, and incorporation of negotiated issues, decisions, and lessons learned, will not increase scope of the project. One major concern is the unknown number of risk options to be calculated in the HHRA.
2. The OU 3 Draft RI Report will contain some unvalidated data but validation will be completed for the final report.
3. Only three-quarters of groundwater data will be available for the draft report rather than four. The final report will include all four quarters of this low priority pathway data.
4. Only six of twelve months of the ultra-volume air monitoring samples will have been collected for the draft report. The final report will contain a year of data collection with a comparison of the ultra-volume data and the more extensive RAAMP data.
5. Changes in the Option B project will not add additional cost or scope to the OU 3 RI Report. Of concern is the unknown future configuration of Great Western Reservoir and its impact on assessing the future HHRA in the RI Report.
6. Review of the draft and final reports will be performed in parallel by EG&G, DOE/RFO and DOE/HQ.

# Rocky Flats Plant Operable Unit 3 Schedule of Work: 1993-94



Project: OUS Schedule: 1993-94  
 Date: 5/28/93

**Critical** **Progress** **Milestone** **Summary** **Rolled Up**

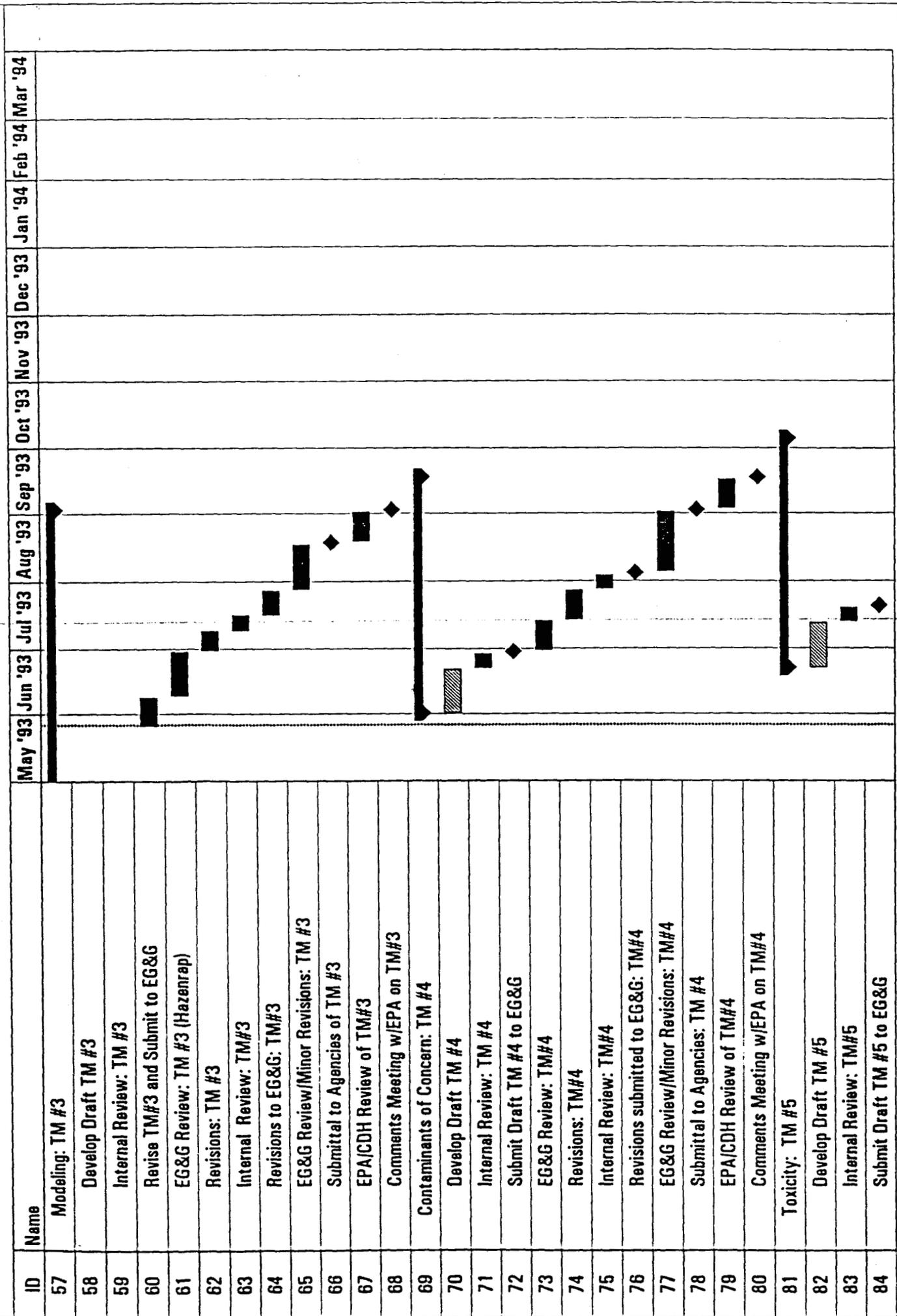
# Rocky Flats Plant Operable Unit 3 Schedule of Work: 1993-94

ID	Name	May '93	Jun '93	Jul '93	Aug '93	Sep '93	Oct '93	Nov '93	Dec '93	Jan '94	Feb '94	Mar '94
29	Fish Tissue Data Cleanup											
30	Air Sampling											
31	RFP Approval of Engineering											
32	Installation of Air Sampling Equip.											
33	Air Sampling											
34	Lab Turn-Around Time: Air Samples											
35	Task 5: Data Mgt./Eval.											
36	Database Management Plan (DMP)											
37	Develop Draft Plan											
38	EG&G Review											
39	Implement DMP											
40	Database Cleanup Script											
41	Database Extractions											
42	GIS Applications											
43	Data Protocols Memo											
44	Draft Protocols Memo to EG&G											
45	EG&G Review/Update											
46	Implement Data Protocols											
47	Task 6: HHRA											
48	Exposure Scenario: TM #2											
49	Draft TM #2 to EG&G											
50	EG&G Review: TM #2											
51	Revisions/Internal Review: TM #2											
52	Revised Draft to EG&G: TM #2											
53	EG&G Review/Minor Revisions: TM #2											
54	Submittal to Agencies: TM #2											
55	EPA/CDH Review: TM #2											
56	Comments Meeting w/EPA on TM #2											

Project: OUS Schedule: 1993-94  
 Date: 5/26/93

Legend:  
 Critical:  Critical  
 Noncritical:  Noncritical  
 Progress:  Progress  
 Milestones:  Milestones  
 Summary:  Summary  
 Rolled Up:  Rolled Up

# Rocky Flats Plant Operable Unit 3 Schedule of Work: 1993-94

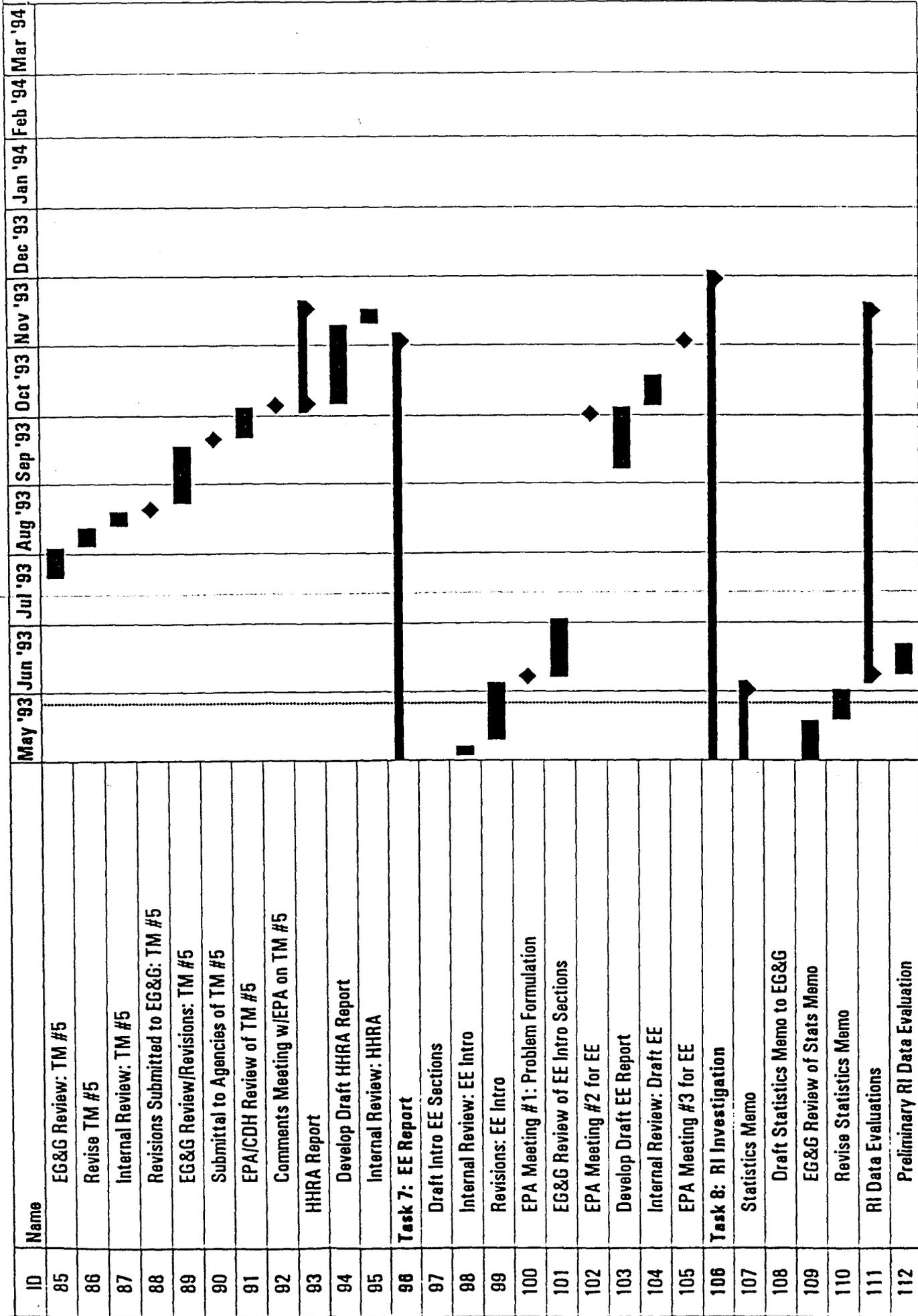


Project: 003 Schedule: 1993-94  
Date: 5/26/93

**Critical** [Solid bar]  
**Progress** [Hatched bar]  
**Milestone** [Diamond]

**Summary** [Thick bar]  
**Rolled Up** [Thin bar]

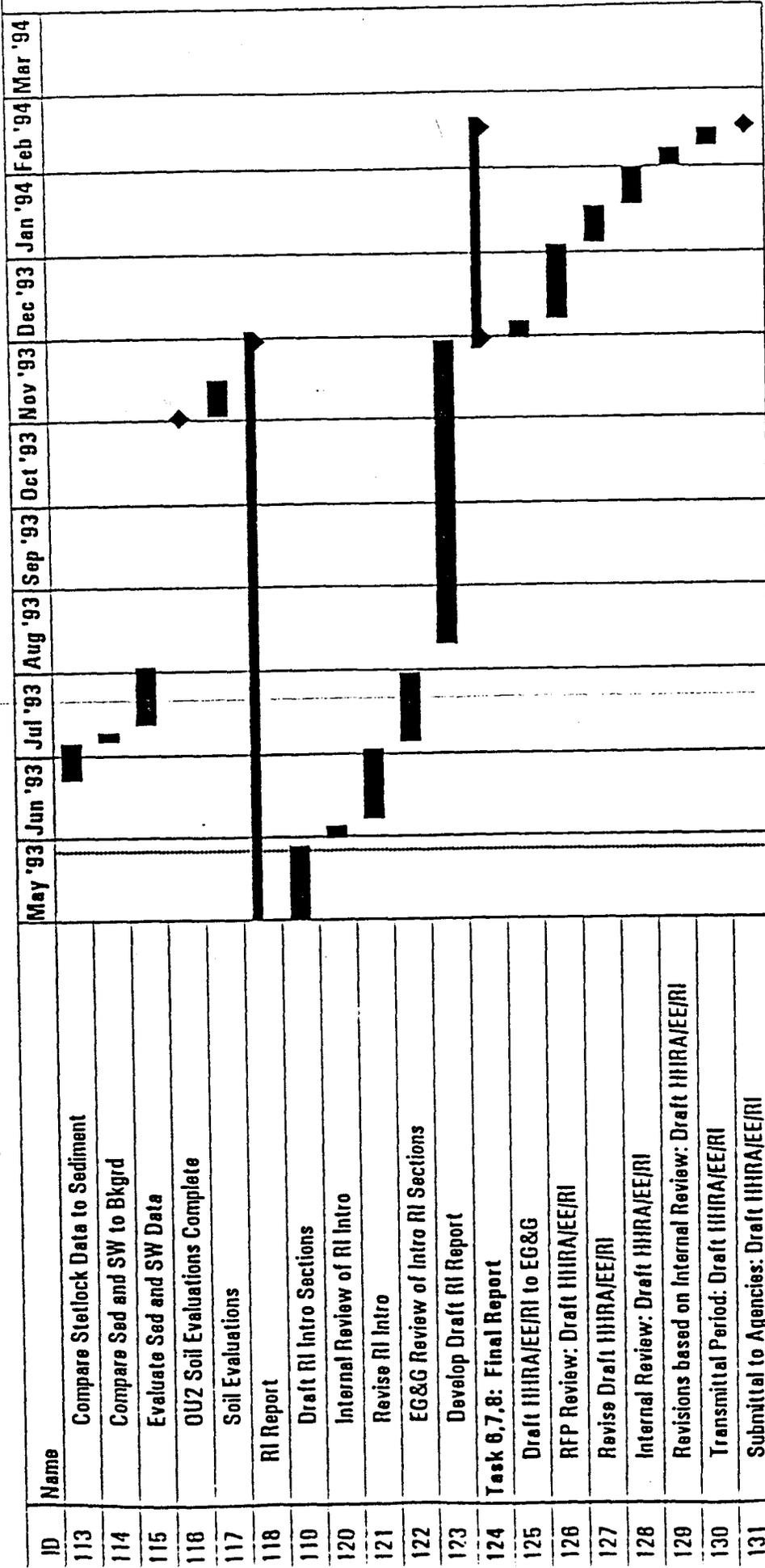
# Rocky Flats Plant Operable Unit 3 Schedule of Work: 1993-94



Project: OJ3 Schedule: 1993-94  
 Date: 5/28/93

Legend:  
 █ Critical  
 ▨ Noncritical  
 █ Progress  
 ◆ Milestone  
 █ Summary  
 ◇ Rolled Up

# Rocky Flats Plant Operable Unit 3 Schedule of Work: 1993-94



**Critical** **Progress** **Summary**   
**Non-critical** **Milestone** **Roll Up**



