

# EG&G ROCKY FLATS

# 15690

92RF3202

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

DIST.	INITIALS	DATE
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
BURLINGAME, A.H.		
CARNIVAL, G.J.		
COPP, R.D.		
CROUCHER, D.W.		
DAVIS, J.G.		
EVERED, J.E.	X	
FERRERA, D.W.		
GOODWIN, R.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HILBIG, J.G.		
IOEKER, E.H.		
KERSH, J.M.	X	
KIRBY, W.A.		
KUESTER, A.W.		
KRIEG, D.		
LEE, E.M.	Y	
MAJESTIC, J.R.		
MARX, G.E.		
MCDONALD, M.M.		
MORGAN, R.V.	X	
POTTER, G.L.	X	
PIZZITO, V.M.		
SANDLIN, N.P.		
SHEPHERD, P.I.		
SULLIVAN, M.T.		
SWANSON, E.R.		
TALLMAN, K.G.		
WIEBE, J.S.		
WILKINSON, R.B.		
WILSON, J.M.		
YOUNG, E.R.		
ZANE, J.O.		

March 20, 1992

92-RF-3207

Robert M. Nelson, Jr.  
Manager  
DOE, RFO

Attn: J. K. Hartman

## STATUS OF BIOLOGICAL REGULATION COMPLIANCE PROGRAMS (2613) - JMK-0264-92

EG&G has received your letter of March 13, 1992 (2613, 1485-RF-92) requesting a written status report on our efforts to provide an acceptable level of compliance with biological regulations through creation of a Resource Protection Program (RPP). Currently, full funding for this program is in review through the Plant Change Control Board. We do not anticipate any problems in acquiring the funds for the RPP and fully expect the process to be complete by April 3rd. RPP initiation would then occur approximately two months ahead of the schedule indicated in our revised funding request letter (92-RF-0305), wherein we estimated 12-16 weeks from approval to initiation.

While moving toward initiation of the RPP, we have maintained a positive biological regulation compliance posture in several ways: (1) by preparing habitat and biological surveys for the French Drain and South Interceptor Ditch projects, both of which received positive concurrence from the U.S. Fish and Wildlife Service, (2) by conducting extensive ground surveys for *Spiranthes diluvialis* (a small orchid recently listed as endangered) at OU1, OU2, OU4, and along the South Interceptor Ditch, (3) by forward scheduling additional *Spiranthes* surveys for March 23rd and the July/August timeframe in anticipation of receipt of RPP funding, and (4) by generating personnel requisitions which, when filled, will give the RPP a dedicated four-person technical staff. Additional actions undertaken by EG&G to achieve biological regulation compliance are detailed in Attachment 1.

EG&G is fully aware of the IAG milestones and has attempted to avoid having any aspect of the RPP funding process impact IAG schedules. We are pleased with DOE, RFO's interest in the status of the RPP and will continue to keep DOE, RFO fully informed of its progress. EG&G and subcontractor personnel will be in the field beginning with this summer season to conduct detailed endangered species, habitat, and wetland surveys. In the future, once the RPP is fully operational, we anticipate achieving a far more proactive posture with respect to biological regulation compliance.

Allhoff, F.H.	X
Rhoades, J.I.	X
Gemison, F.A.	X
Nesta, S.K.	X
HEALY, T.J.	X
HLC Files	
CORRES CONTROL	X

### CLASSIFICATION

UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER  
SIGNATURE

DATE

IN REPLY TO LTR NO

1485

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LTR APPROVALS

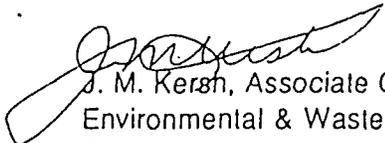
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14-0004-000385

R. M. Nelson, Jr.  
March 20, 1992  
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If there are any questions or concerns, please contact Steve Nesta on 273-6076 or Richard Flory on 273-6188.

  
J. M. Kerst, Associate General Manager  
Environmental & Waste Management  
EG&G Rocky Flats, Inc.

BKH:Img

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

Enclosures:  
As Stated

cc:  
F. Lockhart, ERD, DOE  
R. Schassburger, ERD, DOE  
B. Thatcher, ERD, DOE