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CORRESPONDENCE CONTROL  
OUTGOING LETTER NO.

DOE ORDER #

93-RF-12846

# EG&G ROCKY FLATS

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

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MOTTER, G.L.	
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WILKINSON, R.B.	
WILLIAMS, S. (ORCI)	
WILSON, J.M.	
WYANT, R.B.	
Leahy, J.	Y
McC	Y
1/25/93	X
1/25/93	Y
FILE (10)	Y
Ex. M. [Signature]	Y
CORRESPONDENCE CONTROL	Y
ADMIN RECORD	Y
PATST7130G	
TRACER	

October 20, 1993

93-RF-12846

Frazer Lockhart  
Environmental Restoration Division  
DOE, RFO

PROCEEDING WITH INTERIM MEASURE TITLE II DESIGN - SRK- 227 -93

EG&G requests DOE concurrence to proceed with Title II Design for the Solar Ponds Interim Measure Remedy in parallel with completion of the National Environmental Policy Act (NEPA) process for the project. We are requesting this concurrence now so our staffs can assure the regulators that we will fulfill DOE's policy that the NEPA process will not delay clean-up activities.

As noted in DOE Order 4700.1, Part F, NEPA documentation is generally completed prior to initiation of detailed design work. Initiation of substantial detailed design work prior to completion of the NEPA process can incur program risk in (a) prejudicing the NEPA process with attendant litigation risk and criticism; and (b) prematurely committing financial and other resources to the project. On the other hand, initiatives to consolidate or coordinate environmental reviews may be quite useful and productive.

EG&G feels the proposal to proceed with Title II Design concurrently with the NEPA process does not incur unacceptable program risk, but rather represents one of the productive consolidations encouraged by the Order.

The NEPA process will not be prejudiced by proceeding with Title II Design. The Title II Design will be based on an Interim Measure/Interim Remedial Action Decision Document (IM/IRA) that, in accord with DOE Order 5400.4, integrates NEPA documentation with the IM/IRA. According to the DOE-approved project schedule, DOE review of the document for the purposes of NEPA will be nearly complete and DOE will know if a Finding Of No Significant Impact or other decision will apply when EG&G begins Title II Design. Thus, DOE's NEPA decision-making process will be well advanced and therefore resistant to criticism that the investment in Title II Design prejudiced DOE's decision.

The scheduled date to commence Title II Design is not premature. Extensive communications with the regulators will be incorporated into the IM process, so DOE will have an excellent basis for committing the resources needed to begin Title II Design at the scheduled date.

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IN REPLY TO RFP CC NO.

ACTION ITEM STATUS

- PARTIAL/OPEN
- CLOSED

LTR APPROVALS:

ORIG & TYPIST INITIALS

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The schedule established for the IM process for the Solar Ponds represents a new initiative to streamline closure for the ponds. The process has been consolidated through a dispute resolution process among DOE, CDH, and EPA in which administrative documents have been eliminated to allow the work to proceed more quickly. The overlap between the NEPA process and Title II Design is crucial to fulfilling DOE's commitments to the regulators. This IM process will deliver a two-year acceleration of the project schedule.

Please provide your concurrence that proceeding with Title II and the NEPA process in parallel meets DOE's requirements, particularly 4700.1 requirements, by November 19, 1993. If you would like to discuss this request further, please contact Andy Ledford, extension 8673, or Randy Ogg, extension 8608.



S.R. Keith  
Program Director  
Solar Pond Projects  
EG&G Rocky Flats, Inc.

KCL:jec

Orig. and 1cc: F. R. Lockhart

cc:  
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E. O'Toole - DOE,RFO  
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P. Witherill - DOE,RFO