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RF 8638

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
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BENJAMIN, A.	<input type="checkbox"/>	<input type="checkbox"/>
BERMAN, H.S.	<input type="checkbox"/>	<input type="checkbox"/>
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DAVIS, J.G.	<input type="checkbox"/>	<input type="checkbox"/>
ERRERA, D.W.	<input type="checkbox"/>	<input type="checkbox"/>
FANNI, B.J.	<input type="checkbox"/>	<input type="checkbox"/>
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McKENNA, F.G.	<input type="checkbox"/>	<input type="checkbox"/>
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MILEY, J.H.	<input type="checkbox"/>	<input type="checkbox"/>
MANDLIN, N.B.	<input type="checkbox"/>	<input type="checkbox"/>
SHEPLER, R.L.	<input type="checkbox"/>	<input type="checkbox"/>
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SWANSON, E.R.	<input type="checkbox"/>	<input type="checkbox"/>
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WILLIAMS, S. (ORC)	<input type="checkbox"/>	<input type="checkbox"/>
WILSON, J. M.	<input type="checkbox"/>	<input type="checkbox"/>
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<i>Traffic</i>	<input type="checkbox"/>	<input type="checkbox"/>

July 23, 1993

93-RF-8638



J. K. Hartman
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Attn: R. J. Schassburger

COMPREHENSIVE RISK ASSESSMENT COMMENTS - RLB-352-93

The document entitled "Rocky Flats Plant Comprehensive Risk Assessment (CRA) Scoping Document" has been reviewed and we are providing our comments. In summary, EG&G believes that the scoping document has many favorable attributes, and it can be enhanced. However, we also feel that the scoping document duplicates some effort, and is not consistent with the Interagency Agreement (IAG) requirements, and could pose significant administrative problems to implement.

The document outlines a Comprehensive Risk Assessment (CRA) that is comprehensive and well developed. The components of the CRA (i.e., the 12 facets of the Work Breakdown Structure (WBS)) as outlined show that a good deal of thought went into their development. Also, the breakdown of the different components along with their flow within the CRA is logical. The first year schedule will require a concentrated effort to obtain.

There are three areas of concern within the scoping document: 1) Duplication of Effort, 2) Program Consistency and 3) Administrative/Technical Incompatibility. It is important that these are addressed before the efforts on the CRA are expanded.

Duplication of Effort - It appears that some efforts scoped in the CRA and identified in the Sitewide Environmental Impact Statement (SWEIS) are duplicated. Duplication of effort should not be allowed for two reasons: resources will be wasted, and possibly disparate results will occur. When two equal and parallel activities come up with two different answers, twice the amount of money needed will be spent, and extra money will be spent evaluating the differences between the two activities.

Two EG&G efforts are being duplicated in the CRA by the way contaminant sources are being evaluated. Within the CRA, sources of contamination are being defined only within the industrial area of the plant, and these sources are being subsequently modeled from this area. This exercise will define historical and current releases from the plant that were both routine and non-routine. The SWEIS is currently underway and the sources of contamination on the whole RFP site are being defined within this NEPA effort. Current emissions from these sources are being defined within the SWEIS framework.

CLASSIFICATION:

UCNI	<input type="checkbox"/>
UNCLASSIFIED	<input type="checkbox"/>
CONFIDENTIAL	<input type="checkbox"/>
SECRET	<input type="checkbox"/>

AUTHORIZED CLASSIFIER SIGNATURE
not req'd per class. office exemption

IN REPLY TO RFP CC NO:
NA

ACTION ITEM STATUS
 OPEN CLOSED
 PARTIAL *WBS:*

LTR APPROVALS:
CG:TB umh:TA
ORIG & TYPIST INITIALS
Dms/ret

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI
BY <u>G. T. Ostdiek</u>
DATE <u>8-11-93</u>

The second ongoing effort being duplicated is the OU delineation effort within the Environmental Restoration program. The IHSSs outside and within the industrial area are going to be verified through the CRA process. This is a duplication since the IAG has already defined the historical releases that define all the IHSSs. Also, any discovered emissions that may be designated an IHSS are in the Historical Release Report.

EG&G efforts are being further duplicated within the CRA forum. A CRA forum is currently being proposed within the scope of the CRA. This group would delineate technical procedures and policies by which risk assessments are being performed. This group is taking on tasks that are currently being jointly handled by both the Environmental Restoration and Environmental Protection programs at EG&G. The following tasks are being duplicated:

- The Environmental Science and Engineering Division within Environmental Restoration is working to develop a Human Health Risk Assessment (HHRA) template to be used at all OUs at Rocky Flats. This template is evolving through constant interaction with EPA and CDH during HHRA technical memorandum comment resolution.
- A Strategic Engineering Analysis team has been convened by the Ecology & NEPA Division within Environmental Protection Management to address risk assessment issues that affect the Rocky Flats Plant. This team is currently developing an Ecological Risk Assessment (ERA) template for use in Environmental Restoration activities, developing a methodology to address incremental and cumulative risks from all of Rocky Flats Plant for use in the SWEIS, and preparing an evaluation of the future land uses for use by the SWEIS, the Integrated Planning Process (IPP) and the Annual Rocky Flats Environmental Report.

Program consistency means that the risk assessment process being proposed for the CRA must be consistent with the risk assessment process being used for the OU specific risk assessments. Paragraph 154 of the IAG states "...the OU specific Risk Assessments shall form the basis for the Comprehensive Risk Assessment....The OU-specific and Comprehensive Risk Assessments shall comply with the requirements of CERCLA, RCRA, CHWA and pertinent guidance and policy as set forth in the Statement of Work." This clearly shows that the CRA and the OU specific risk assessments processes are to be equivalently based. This does not seem to be the case in the CRA. EG&G is concerned that different data quality objectives and data utilization protocols between the CRA and the sixteen OUs will result in disparate assessments.

First, the CRA proposes to integrate DOE/CDH/EPA database management systems for CRA use. Since the CRA needs to be based on OU specific data, it is not understood why the RFEDS Database at EG&G is not being used as the sole database for the CRA activities. All OU specific information is contained in this database, and all OU specific data evaluations start with RFEDS data. Therefore, to achieve consistency in findings the CRA should use the RFEDS database.

It is proposed to use other than OU specific sampling data to perform the CRA. There are numerous data sources within the CRA scoping document that will be used in the CRA process. This alternate data may not meet the stringent QA requirements of the OU specific data. Data validity could become a serious issue if CRA and OU-specific studies suggest different findings. This data is not required for use by the IAG.

Administrative and Additional Technical Incompatibilities - The last area of concern, and certainly the most critical, is administrative and technical incompatibilities between the CRA objectives, implementation of the CRA, application of the CRA findings, and the IAG. This incompatibility exists because there is no clear link between the CRA process and the OU specific process as outlined in the IAG. The first concern is that the schedules and budgets for the two efforts are not linked. This link is especially needed if the CRA process is going to affect the OU specific remediation decisions. We feel that there are two separate but equally applicable links that need to be made if remediation decisions are to be affected. These are:

- An administrative review of Section 154 of the IAG does not identify a specific objective or purpose of the CRA. However, throughout the CRA scoping process, it is very apparent that the CRA is intended to impact remediation decisions on individual OUs. Most likely, the CRA will result in decreasing remediation action levels (i.e. cleanup required at lower chemical concentrations). As EG&G understands the application of the CRA, it appears that all individual RODs will be open-ended until CRA findings are integrated. Such integration will likely result in lowering remediation levels at additional expense. There currently exists no mechanism by which findings external to an individual OU's administrative record (e.g., the CRA) are brought to bear on the ROD; however, as pointed out above, this accurately depicts the current thought of the CRA's role.

EG&G feels that this will not only adversely impact implementation of the IAG, but will also hamper DOE's ability to effectively scope and plan for environmental remediation efforts in the future. Additionally, EG&G questions the advisability of DOE entering into a process (i.e., the CRA) whereby RODs are held in abeyance, subject to revision, and in which additional remediation efforts may be required at dates well after passage of IAG milestones. It is possible that DOE could have to: (1) suspend feasibility studies (and downstream milestones) until CRA findings are available, and/or (2) go back to individual OUs after the feasibility study or ROD and reevaluate remediation strategies, and possibly perform additional remedial action/corrective action(s).

- From a technical perspective the total risk allowable from all 16 OUs may have to be defined before any RODs are signed, and each OU would be allotted a certain amount of risk depending on a defined criteria. Land use issues and establishing acceptable risk have not been addressed to-date. Those issues would have to be resolved in a timely manner to facilitate implementation. The CRA would be evaluated at the FS stage so that any impacts from the CRA are incorporated into the proposed remediation technique. An OU specific risk assessment and a CRA component would be performed for each remediation alternative. An individual OU risk would need to fall within its allotted risk. This would mean a CRA component needs to be performed at the FS stage for each OU.

It is also of concern that the risk assessment methodology to be used for the CRA will differ from the methodology used in EG&G's OU specific risk assessments and from the methodology employed in the SWEIS. There is again no clear link between the CRA and the OU specific risk assessment methodologies. It is essential that EG&G personnel assure that the OU specific risk assessment methodologies are used as the basis for the CRA as the IAG directs. These components then need to feed into the SWEIS.

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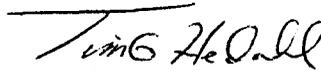
EG&G feels that the efforts to-date are positive and substantial. However, based on the issues identified above, EG&G feels that additional time is necessary to further refine the technical, administrative and legal aspects of the CRA.

We propose that DOE proceed with their planned briefing to EPA and CDH. We recommend that the issues raised above be placed on the agenda so that they may be discussed and factored into the tri-party decision regarding implementation of Section 154.

It is also recommended that the CRA concept continue. As currently scoped the CRA duplicates effort and will not be consistent with the IAG. To fix these problems, it is further recommended that EG&G take the technical lead for the CRA under the Integrated Planning Process (IPP). EG&G's IPP will assure that all activities are correctly coordinated. EG&G would acquire adequate resources to perform this task if directed to do so. If you have any questions, please contact D. M. Smith of Environmental Engineering & Technology at extension 8636.



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