



INTEROFFICE CORRESPONDENCE

DATE: August 2, 1993

TO: K. Bentzen, Environmental Quality Support, Bldg. 080, X8753

FROM: *Z* R. S. Luker, Environmental Quality Support, Bldg. 080, X8625

SUBJECT: COMPARISON OF ER QUALITY ISSUES/RISKS AT EG&G ROCKY FLATS PLANT (RFP) WITH THOSE NOTED BY THE DEPARTMENT OF ENERGY (DOE) INSPECTOR GENERAL AT OAK RIDGE NATIONAL LABORATORY (ORNL).

Ref: J. G. Davis ltr, JGD-1050-93, to R. L. Benedetti, Report on the RI/FS Study Process at Oak Ridge National Laboratory, July 15, 1993.

On the referenced memo, Ned requested (handwritten) advice on areas that we may be at risk; my response is below:

Department Of Energy (DOE) criticized the contractor at Oak Ridge National Laboratory for providing little value for the monies spent on the RI/FS program to that time. Several reasons for this conclusion were given in the report; I will not try to summarize all of them here, but list those related to our QA program:

1) In general, we have many of the same types of problems with data quality as those discovered at Oak Ridge, especially regarding:

- Comprehensive documentation of data acquisition/reduction.
- Effective communication of:
 - data interpretation in major report deliverables.
 - corroboration for conclusions.
- Document approvals before document implementation in the field.
- Quality control sampling.
 - Required frequencies.
 - Communication of impact on quality.
- Sample chain-of-custody.
- Data validation versus usability.
- Training deficiencies.

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- QA problems.
 - Lack of corrective action confirmation and clear time constraints.
 - Scheduled inspections/surveillances and implementation.
- 2) Corrective Action Item "ER-35" is of particular interest: it states that most corrective actions are late or lengthy, and that *more emphasis should be placed on taking immediate (interim) corrective action...and addressing internal audit and surveillance issues*. I would argue that this is not practically possible within the current organizational framework and emphasis. Emphasis is currently placed on identification of problems, period; there is no significant constructive help in **implementing** corrective actions or "quality improvement" -- we talk about it, but we fail (as a group) in taking a proactive role.

My emphatic recommendation on how to minimize the same types of problems in our RI/FS programs (and ER programs in general), is to *dedicate selected staff members to implement corrections and improvements* to the risky issues that we are currently aware of before formal assessments take place: future formal assessments will **re-identify** known problems, but not correct the problems or improve quality in a **timely** manner.

If our Quality Assurance (QA) staff is internal within Environmental Restoration (ER), then let's function as if we're internal, and improve quality **with** the staff; a "technical implementation" group is now being assembled, and is proceeding with the limited staffing.

cc:
M. C. Brooks
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