

# Memorandum

DATE: August 8, 1996  
REPLY TO: Office of the Departmental Representative to the Defense Nuclear Facilities  
ATTN OF: Safety Board: S-3.1:6-3887  
SUBJECT: RECOMMENDATION 94-1 CONCERNS

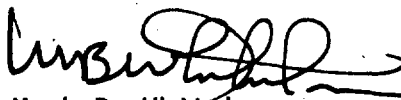
TO: Richard Guimond, EM-2

I would like to make you aware of two issues which may have an impact on Implementation Plan commitments and milestones in response to Recommendation 94-1. These issues deal with staffing redeployment planning and a new effort to prepare an Environmental Impact Statement (EIS) on stabilization of plutonium residues at the Rocky Flats Environmental Technology Site. The Rocky Flats EIS issue was raised as a concern at the last meeting between the Under Secretary and the Board on August 2, 1996.

The second issue is the Notice of Intent to prepare an EIS for treating Rocky Flats residues which may further delay the site's completion of its 94-1 Implementation Plan residue milestone commitments. There is already an existing Rocky Flats Environmental Assessment (EA) for Solid Residue Treatment, Repackaging and Storage (DOE/EA-1120). DOE has identified a need to evaluate alternatives to provide for stabilization and preparation of the residues for ultimate disposition. In addition, another category of material, scrub alloy, will be included in this EIS which was not defined as a residue in the EA since it was created for the purpose of later plutonium recovery. If the EIS is required, what action can be taken to ensure that the EIS process does not cause the Rocky Flats 94-1 residue milestones to slip any further?

The Board met with Al Alm on August 2, 1996, and pointed out that they consider 94-1 to be EM's top priority Recommendation. This has been a successful Implementation Plan largely because of EM's centralized management through the Nuclear Materials Stabilization Task Group (NMSTG) which needs to be considered in any redeployment planning.

Both of these issues should be reviewed for their potential impact on the Department's Implementation Plan for Recommendation 94-1.



Mark B. Whitaker  
Departmental Representative  
to the Defense Nuclear  
Facilities Safety Board

CC:  
J. Tseng, EM-4