

United States Government

Department of Energy

Rocky Flats Field Office

memorandum

DATE: JAN 27 2000

REPLY TO:
ATTN OF: AME:ESD:MH:00-01159

SUBJECT: Rocky Flats Field Office Commitment to DOE Order 5632.7A Interpretation

TO: Robert G. Card
President
Kaiser-Hill Company, L.L.C.

The purpose of this memorandum is to formally document the Department of Energy (DOE), Rocky Flats Field Office (RFFO) acknowledgement of the Kaiser-Hill Company, L.L.C. (K-H) interpretation of certain DOE Orders and Directives in the K-H Contract DE-AC34-00RF01904. The DOE RFFO expects K-H to conduct its business at the Rocky Flats Environmental Technology Site (Site) in accordance with all DOE Orders and Directives included in Section J, Attachment B of the contract.

The DOE also recognizes the unique nature of the closure contract for the Site and is committed to ensuring a flexible interpretation of DOE Orders and Directives to move the project to its safe and expeditious conclusion. Section J, Attachment B includes provisions for a "sunset clause," and self-deleting of requirements not applicable to the Site. Through the standard exemption process, the DOE RFFO and/or DOE Headquarters will exempt K-H from those DOE Orders and Directives and portions of such Orders and Directives on a case by case basis as appropriate.

Additionally, the DOE RFFO has considered site-specific interpretations of DOE Orders and Directives more appropriate to a closure contract. In cases where a modified interpretation would enhance the progress of closure without a significant impact on public health and safety, the environment, or site safeguards and security, DOE RFFO will implement such an interpretation.

Specifically, Chapter IV.3.b (3) states: "Formal annual refresher training may be exempted when a Security Officer satisfactorily demonstrates a knowledge, skill, or ability. Such exemption shall be documented." K-H will adopt the above subparagraph as its routine practice. This does not apply to firearms proficiency which shall be accomplished every six months. Rather than Security Officers attending refresher training and then being tested on their knowledge, skills, and abilities, their competencies will be tested first. Testing to physical qualifications must be done by actual physical testing. As required in Chapter IV.3b (2), "failure to achieve a minimum level of competency shall result in the Security Officer's placement in a formal remedial training program". Security Officers will attend remedial training for areas in which competency levels were not demonstrated.

The DOE RFFO reserves the right to reevaluate or eliminate any modified interpretation and to require specific compliance with all applicable DOE Orders and Directives. Any further change to this interpretation would be subject to standard contractual change control requirements.



Paul Golan
Acting Manager

cc:

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