



INTEROFFICE CORRESPONDENCE

DATE: October 30, 1997

TO: R. B. Heitland, RMRS Building 123 Project Manager, T891C, X2862

FROM: D. L. Hoyt, Engineering Bldg. T130F, X6742

SUBJECT: RESPONSE TO BUILDING 123 ENVIRONMENTAL READINESS
EVALUATION QUESTIONS - DLH-058-97

PURPOSE

The purpose of this memo is to respond to questions from DOE and Kaiser-Hill pertaining to the Decommissioning of Building 123.

DISCUSSION

The following are responses to questions from Larry Maghrak, DOE:

1. "Both IWCP FB410-03-2 and FB0410-03-4 reference HSP procedures that are past their periodic review dates. Nine of the 15 Health and Safety Practices procedures listed in the Developmental References section (Section 5) are beyond the required periodic review requirement date. Site Documents Requirements Manual, Revision 0, section 2.N identifies the requirements to perform periodic reviews. This issue of missed periodic reviews has been previously identified to Kaiser Hill, and this seems to indicate that the problem still exists. It is not clear whether any organization questions the significance of missed reviews. The periodic review is intended to keep the procedure "current" with site practices and technical changes. It appears that most organizations do not question the validity of a procedure that is beyond its specified periodic review date. The Health and Safety Practices manual will be used extensively in the Decommissioning and Decontamination process, and it seems reasonable to expect that Kaiser Hill would ensure that Site Document Requirements Manual requirements are met. It is noted that none of the procedures reviewed appears to be technically inadequate. However, they may not include efficiency improvements or better methods of providing for health and safety."

"Note: Intent change DMRs are not recognized by the SDRM as a method to perform periodic reviews. Category Use 1, 2 and 3 have three year cycle, all other documents are on four year cycle."

RESPONSE: This issue has been forwarded to Kaiser-Hill, Safety and Industrial Hygiene. The Department is aware of the issue and is currently working on revising the Health and Safety Practices Manual.

2. FB0410-03-4 "BLDG 123 STRIP-OUT"
 - a. "Para. 8.2.4: If this asbestos work is subcontracted out to a company that meets OSHA training then it is most likely that their workers are respirator qualified. Is there any way to make an equivalency between their respirator quals (assuming they have reasonable documentation) and HSP 7.03 requirements?"

ADMIN RECORD

B123-A-000141

Y 8

RESPONSE: Yes. Training documentation provided by the Subcontractor is reviewed for compliance with OSHA 1910.134, ANSI Standard Z88.2-1992, and HSP 7.03. The Asbestos Abatement Subcontractor has submitted their Respiratory Protection Program and it is currently under review by RMRS Health and Safety.

- b. "Para. 8.2.5: If the lead workers are trained per CFR 1926.62 and the company has reasonable documentation of this, can't an equivalency be made between their training and that provided by course 019-574-01?"

RESPONSE: Yes. An equivalency can be performed if training documentation is provided by the Subcontractor. The training documentation is reviewed for compliance with CFR 1926.62. The Subcontractor can be given credit if they meet or exceed site requirements.

- c. "Para. 9.4.1: What method will be used to record POTENTIAL multiple LO/TO? If multiple LO/TO are expected why aren't more data blocks provided? Will there be field generated paperwork to be included as an appendix that tracks LO/TO?"

RESPONSE: A LO/TO will be necessary if the utilities are not isolated prior to work on a specific task. The Contractor's (RMRS) LO/TO program will be utilized. The Subcontractor will be responsible for and verifying that the appropriate LO/TO is in place. Multiple LO/TOS will be tracked according to the requirements of procedure 1-15320-HSP-2.08. This procedure requires the completion of a LO/TO Permit which allows multiple LO/TO's to be performed and tracked.

- d. "Para. 9.4.2: Similar to above. Multiple LO/TO will require multiple sign offs."

RESPONSE: Multiple LO/TO will be tracked according to the requirements of procedure 1-15320-HSP-2.08. This procedure requires the completion of a LO/TO Permit which allows multiple LO/TOS to be performed, tracked and signed-off.

- e. "Para. 9.9.2: Decontamination per 4-3000-F0-001 included as a appendix has an effective date of 11/12/92. This document is past it's periodic review date also. See above."

RESPONSE: This procedure was updated most recently on June 2, 1997.

- f. "In general, this package does not seem to capture essential activities identified in section 02075 of the SOW."

RESPONSE: The IWCP references the Construction Package (Statement of Work, Specifications, Drawings and Reference Documents) throughout, and the Construction Package is attached in Appendix 14. The Subcontractor is required to fulfill all requirements of the Construction Package since this is the basis of their subcontract with Kaiser-Hill. It is not necessary to restate the entire Construction Package, including Specification 02075, in the IWCP.

3. STATEMENT OF WORK FOR B123 STRIP-OUT

- a. "The statement of work included in the contract had the wording changed from "deactivation" to "strip-out". Revisions that change contractual language are usually significant, yet this wording change was not reflected in the associated IWCP. This may or may not be meaningful but is a difference noted."

RESPONSE: This word change has been incorporated into the IWCP. The meaning and scope remains the same for the package.

- b. "Section 01503 G: Subcontractor provides shower and change facilities. Will contractor provide water and sanitary connection? If so, where is this identified?"

RESPONSE: Yes. The Contractor will provide water and sanitary hookups connections at specified locations designated by RFETS Utility Department.

- c. "Section 01503: In general this does not address maintaining heat in the building and does not seem to provide the sub-contractor any control over the securing of building heat. Strip-out work will be performed in cold weather and personnel comfort is a consideration. It is understood that heat is circulated by building ventilation and this ventilation could impact asbestos removal. Removal of asbestos using a zone concept would allow boundary zones to have heat while securing/blocking/sealing building ventilation in the asbestos removal zone. The building tour of 9/30/97 indicated that the subcontractor would have to provide heating to the building. In section 02075 sub section 3.3 there is a statement that indicates that utility isolation is anticipated to occur towards the end of the strip-out stage. Since this sort of detail is not included in the IWCP package and it is not clear that the statement of work will be attached/included as part of the IWCP package, the isolation of utilities may not be properly controlled. Furthermore, the Objective statement of the statement of work defines strip-out as the removal of specified systems in B123 and the isolation of utilities. The definition implies that there will be no site supplied heat, water or power in the building during asbestos removal. "

RESPONSE: As stated in the response to question 2 (f), the Construction Package (SOW, Construction Specifications, Drawings and specific Reference Documents) is an integral part of the IWCP. The intent of the Construction Package is to give the Subcontractor complete control of the work to be accomplished; including isolation of utilities. Details for the strip-out tasks, including asbestos abatement and utility isolation, are left to the Subcontractor to determine and are not specified in the Construction Package or the IWCP. The Subcontractor is required to be experienced in this type of work, and coordination of details such as building heat and HVAC isolation during asbestos abatement is the responsibility of the Subcontractor.

The Subcontractor is responsible for providing all of their own power for heating, lighting etc. per Specification 01503. Similarly, the Asbestos Abatement Plan is developed by the Subcontractor who is certified to perform such work. It is anticipated that utility isolation will occur towards the end of the Strip-Out stage as specified in section 02075. The Subcontractor will most likely maintain heating capability during the Strip-Out activities, modify the HVAC system as needed during abatement, then isolate the steam and power when complete.

- d. "Section 2.2.3 of the statement of work identifies that process hoods and associated ducting as suspected to have radiological contamination, although there is no indication if it is fixed or loose. During Strip-Out some hoods will be flushed because of perchloric acid concerns, with rinsate directed to the sanitary sewer system. If a hood is suspected of having contamination and it is flushed with water how can that water be directed to the sanitary sewer without some sample to check for the presence of radiological contamination? In general, if equipment is suspected to be radiologically contaminated and is going to be flushed the flush water must be controlled until analysis qualifies the radiological condition of the water. See also part 1.1, "General Requirements" and 1.2.1, of section 02075 from SOW. PAM indicates that rinsate goes to sanitary sewer. IWCP FB0410-03-4 does not clearly address the handling of flush water. See also section 02075 part 3.7.2."

RESPONSE: All hoods and their associated ducting will be flushed and packaged as low level waste. All rinse water will be directed to a process waste drain as stated in Specification 02075, section 3.1.5. Rinsate from the hood and ducting wash was never intended to go to the sanitary sewer system. The PAM is incorrect in stating that rinsate will go to the sanitary sewer.

The Subcontractor is required to develop a procedure for rinsing the hoods and ducting. This procedure has been submitted to Kaiser-Hill and RMRS for review. Radiological Engineering is involved in the development and review of this procedure to ensure all radiological concerns are addressed.

- e. "Section 2.2.6 of the SOW addresses other equipment that may have radiological contamination and have been involved with perchloric acid. While there is no statement to flush this equipment (i.e. scrubbers) there may be a temptation at the work site to perform a flush because other perchloric affected items are being flushed. A more positive statement about flush requirements for this equipment may be needed. See also part 1.1 "General Requirements" and 1.2.1 of section 02075 of the SOW. PAM indicates that rinsate goes to the sanitary sewer. IWCP FB0410-03-4 does not clearly address the handling of flush water. See also section 02075 part 3.7.2."

RESPONSE: The scrubbers are a component of the process hood and ducting system in Building 123, and therefore will be included in the flush cycle as required by Specification 02075, section 3.7.2. Ducting from the roof, to the scrubbers, including the scrubbers, will be flushed prior to duct removal from the scrubbers. After the flushing, the scrubbers will be blanked where ducting is removed and internal sampling of the scrubbers will be performed for characterization. The IWCP references the Construction Package which clearly states that all rinsate will go to the process waste system.

- f. "Section 2.2.8.3 of SOW, step 10, addresses freon removal from air conditioners. During the building walk through there appeared to be drinking water fountains that have a self contained refrigeration unit. If this is true then those units should be evaluated for freon removal."

RESPONSE: The drinking water fountains will be evaluated for freon.

- g. "Section 02075 part 1.4.4.2 addresses using water to limit dust during demolition. However, water is not to be used if ice will form. How will dust be controlled when freezing conditions exist?"

RESPONSE: The Subcontractor has stated that the application of water for dust-suppression will be closely controlled to minimize run-off and the formation of ice.

- h. "Section 02075 part 2 identifies specific products that appear to be closure devices for disconnected utilities. This list does not include flanges or bolts for the steam and condensate connections. Also, this list is not reflected or otherwise identified in IWCP FB0410-03-4."

RESPONSE: Items 2.15 and 2.16 in Specification 02075 are for isolation of the steam line. Section 9.12 of the IWCP also calls out these materials.

- i. "How/who will control the following Contractor responsibilities identified in Section 02075:
- Obtaining proper authorization from the RFETS Fire Marshal to deactivate the fire protection system (3.3.3.1).
 - Draining fire sprinkler system (3.3.3.3).
 - Isolation of domestic cold/fire water (3.3.3.4).
 - Disconnection of fire phones, flow switch, and fire bell control panel (3.3.3.5)
 - Removal of insulation from condensate piping on the east side of B123 (3.3.3.7).
 - Flushing of process waste system for RCRA closure (3.8).
 - NOTE: Some of these are sign off steps in IWCP FB0410-03-4, but what procedures will be used to complete some of these activities (e.g. flushing)."

RESPONSE: RMRS will coordinate the activities listed. For all utility isolation, RMRS will coordinate lock out/tag outs with the appropriate department at RFETS (i.e. DynCorp Utilities, Kaiser-Hill Fire Protection etc.) and the Subcontractor will perform the physical isolation and strip-out tasks. Removal of Subcontractor's responsibility. A procedure for flushing has been prepared by the Subcontractor and submitted for review. RMRS will ensure the flushing procedure is consistent with the RCRA Closure Plan for the project.

- j. "Section 02075 part 3.3.3.7 addresses disinfection, flushing and sampling of modified domestic water lines per HSP 13.06. IWCP FB0410-03-4 section 10.1 does not specify any of these actions, why not?"

RESPONSE: Section 10.2 of the final IWCP required disinfection. Flushing and sampling are not required for this modification. Specification 02075, section 3.3.3.7 has been modified so it is consistent with the IWCP.

- k. "In general, there are some very specific activities identified in section 02075 of the SOW that are not clearly identified in the associated IWCP package."

RESPONSE: As stated in previous responses, the Construction Package (SOW, Specifications, Drawings, and specific Reference Documents) is an integral component of the IWCP. It is included in it's entirety in Appendix 14. The Subcontractor is required to completely fulfill all aspects of the Construction Package since it is the basis of the subcontract. The IWCP references the Construction Package for detailed information rather than repeating it.

- l. "Some activities in section 02075 do not provide flexibility with regard to LO/TO. If the power has been disconnected to the building, and the subcontractor does not provide power to a system component, then why LO/TO that component at an already de-energized panel?"

RESPONSE: The sequence of operations for the Strip-Out work is to be determined, for the most part, by the Subcontractor (reference Specification 01104 and Specification 02075, section 1.6). When specific hold points are necessary, or when a work sequence is critical it is stated in the IWCP. As stated in Specification 02075, section 3.3, it is anticipated that most utilities will be isolated at the end of the Strip-Out phase. Therefore, it is likely that equipment will be energized, requiring LO/TO prior to initiation of Strip-out tasks. If the power to Building 123 has been terminated prior to the completion of some strip-out tasks then LO/TO may not be necessary.

- m. "Why didn't section 02075 include the salvage of domestic water line backflow preventors and/or condensate system pumps for potential re-use on site?"

RESPONSE: Only salvaged items that were requested by all reviewing organizations/departments, were included in the Construction Package. Utilities did not request those items to be saved.

- n. "An attached document "Ductwork Washdown/Dismantlement Guidelines" seems to indicate that domestic water is needed for rinsing of perchloric acid hoods. If this is true and the disconnection of domestic water is not controlled properly, then these guidelines become ineffective. Also, these guidelines do not address radiological control of rinsate."

RESPONSE: The rinsing of the hoods and ducting is one of the first activities to be completed. The SOW and IWCP both specify that all rinsate from flushes will be routed to the process waste drain. Isolation of B123 utilities for strip-out (i.e. power line removal, blind flanging water lines and other utility disconnects) will occur near the end of the Strip-out phase. The Subcontractor has confirmed that the perchloric rinse will be their first task.

4. IWCP FB0410-03-2 "B123 DEACTIVATION"

- a. "Para. 8.2.6: If this asbestos work is subcontracted out to a company that meets OSHA training then it is most likely that their workers are respirator qualified. Is there any way to make an equivalency between their respirator quals (assuming they have reasonable documentation) and HSP 7.03 requirements?"

RESPONSE: This asbestos work and all work in the "Deactivation" IWCP is being performed by Rocky Flats Steel Workers.

- b. "Para. 8.2.9: If the lead workers are trained per 29 CFR 1926.62, and the company has reasonable documentation of this, can't an equivalency be made between their training and that provided by course 019-574-01?"

RESPONSE: As stated above, this work will be performed by the Rocky Flats Steel Workers.

- c. "Para. 9.5.1: What method will be used to record POTENTIAL multiple LO/TOs? If multiple LO/TOs are expected, why aren't more data blocks provided? Will there be field generated paperwork to be included as an appendix that tracks LO/TOs?"

RESPONSE: Please see the response to question 2(c).

- d. "Para. 9.5.2: Similar to above. Multiple LO/TOs will require multiple sign-offs?"

RESPONSE: Please see the response to question 2(d).

- e. "Para. 9.8.2: Decontamination per 4-3000-F0-001 included as an appendix has an effective date of 11/12/92. This document is past it's periodic review date also see above."

RESPONSE: As stated in the response to question 2(e), this procedure was updated as recently as June 2, 1997.

5. "There is no mention of the possibility that electrical switchgear breakers may have arc chutes lined with removable transite material. Transite is an ACM."

RESPONSE: RMRS is planning on inspecting the switchgear for ACM during the Asbestos Abatement phase of the project (Phase II) after the power to the building has been terminated.

6. "In general, it appears that there could be a number of LO/TOs installed to support strip-out and deactivation. However, it is not clear that prior to demolition of the building there is confirmation that the building is clear of LO/TOs. It would be a violation of HSP 2.08 to demolish the building with LO/TO in place and the LO/TO devices removed with debris/rubble."

RESPONSE: A step (Step #10.7) has been added to the Strip-Out IWCP to ensure that all LO/TO devices have been removed.

7. "It is not clear who the LO/TO manager for the building will be and if any turnover from previous building LO/TO manager has occurred?"

RESPONSE: The LO/TO Manager will be either the Building Manager for 123 or the Construction Manager (RMRS or K-H) for the Building 123 Decommissioning project.

8. "Which Plan of the Day will these activities be scheduled on?"

RESPONSE: These activities will be scheduled on the "100 area" Plan of the Day.

The following are responses to questions from Greg Schmaltz, Kaiser-Hill:

1. How are the process waste lines going to be characterized?

RESPONSE: The process waste lines will be characterized according to the Closure Plan for Building 123 Components of RCRA Unit 40. Closure will include rinsing the process waste piping, sampling the rinsate for required analysis, visual inspection of the pipe as it is removed for sludge and certification by an independent, registered Professional Engineer.

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2. Please sample the concrete in all of the old sumps, including the sump in room 109.

RESPONSE: The Soil Sampling and Analysis Plan for IHSS 121 and 148 has been revised to include a sample in each sump.

RESPONSE REQUIREMENTS

No response is required. Should you have any questions, please contact Dorthea Hoyt at extension 6742.

DLH:bej

cc:

T. A. Hopkins
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