

hmc

SYNOPSIS

JAN 19 1999

CORRESPONDENCE CTRL NO: AMEC:ERWM:03869

ORIGINATOR: William Fitch, x4013

ISSUE:

Forwarding comments to Kaiser Hill on the Final Closeout Report, Building 123 Decommissioning Project

BACKGROUND:

- RFCA requires a Closeout Report for each accelerated action undertaken at Rocky Flats.
- The demolition of Buildings 123, 113, 114, and 123S was an accelerated action authorized and conducted under the Proposed Action Memorandum submitted to Colorado Department of Public Health and Environment and approved by that agency after public comment on August 25, 1997.
- The Final Closeout Report was submitted simultaneously to CDPHE and RFFO on October 7, 1998.
- OCC provided a review of the document in late October. Their concerns are incorporated into William Fitch's comment table.

RECOMMENDATIONS:

Sign the subject memorandum conveying the comments to Kaiser Hill

bcc: Deputy Manager's Reading File

Copy to Reading Room:

Yes No

ERWM
Fitch:lrs
11/12/98

ERWM
Tyler
11/12/98

AMEC
Legare
12/11/98

DMTP
Klein
1/14/98

Low

98 JAN 19 AM 11:16
CCDH



ADMIN RECORD

B123-A-000180

5800
W7
1-13-98

United States Government

Department of Energy

memorandum

Rocky Flats Field Office

DATE: JAN 19 1999

REPLY TO:
ATTN OF: AMEC:ERWM:WNF:03869SUBJECT: Comments on *Final Closeout Report, Building 123 Decommissioning Project*TO: Alan Parker
Vice President of Closure Projects Integration
Kaiser-Hill Company, L.L.C.

Attached are comments on the subject report provided by the staff of the Assistant Manager for Environmental Compliance. Please make modifications to address these concerns. You may contact me at extension 5878 or William Fitch of the Environmental Compliance staff at 4013 for more information about the comments.



David C. Lowe
Acting Deputy Manager for Technical Programs

Attachment

cc w/Att:
W. Fitch, ERWM, RFFO
J. Rampe, PCD, RFFO
F. Gerdeman, PCD, RFFO
S. MacLeod, ERWM, RFFO
K. Dorr, K-H
R. Mathis, K-H

cc w/o Att:
S. Tower, AIG, RFFO
R. Tyler, ERWM, RFFO
S. Bell, OCC, RFFO

Alan Parker
AMEC:ERWM:WNF:03869

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JAN 19 1999

cc w/o Att:
S. Tower, AIG, RFFO
R. Tyler, ERWM, RFFO
S. Bell, OCC, RFFO

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Comments by W. Fitch
January 12, 1998

Document Project Final Close-out Report
 Building 123 Decommissioning Project

Comment Number	Page	Section	Paragraph	Sentence	
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General see Comment 1,12,17 To distinguish between contract activity versus regulatory activity, there should be two separate documents prepared for the Building 123 Demolition Project: a RFCA Close-out Report and a Contract Completion Report. RFFO has maintained that contract arrangements that it has with its contractors are an internal matter, not open to scrutiny by the regulatory agencies.

1 1 1.0 1 3 This is a closeout report for a RFCA decision document. I suggest the third sentence is inappropriate and should be deleted.

12 Attachment 3 It is not appropriate to include contract documents in the Closeout Report. The Performance Measures are part of the RFFO/K H contract.

17 Attachment 17 I do not think it is appropriate to include a Lessons Learned in a RFCA Closeout document.

Recommendation A separate document: a Contract Completion Report, be prepared by Kaiser-Hill dealing with contract issues. The following attachments should be deleted from the Close-out Report and included in the Contract Completion Report.

- Attachment 3 Performance Measure
- Attachment 4 Environmental Readiness Review
- Attachment 17 Lessons Learned

General	see Comment 2,7,9,13,14					On August 25, 1997, CDPHE approved the Proposed Action Memorandum (PAM) for Demolition of Bldg. 123. In November 1998, Kaiser Hill forwarded a revised PAM to RFFO containing new modifications. RFFO did not forward the November revision of the PAM to CDPHE. In March 1998, Kaiser Hill forwarded Rev 6 of the revised PAM to RFFO. Again RFFO did not forward this revision to CDPHE. Thus the revisions were never submitted to CDPHE by RFFO. RFFO submitted a minor modification to the PAM on May 21, 1998. The cover letter advised CDPHE that RFFO had changed the PAM using an errata sheet approach.
2	1	1.0	3	1		The Proposed Action Memorandum for the Demolition of Bldg. 123 was approved by the Colorado Department of Public Health and Environment on August 25, 1997. This sentence is not accurate.
7	9	3.2	2	3		The sentence "Modifications were made to the PAM in revision 6, March 1998." is inaccurate. See comment 2 above.
9	11	8.0	1	1		Recommend deleting the first sentence and including a discussion of the rationale for each PAM mod.
13	Attachment 4					The attachment to the letter to Steve Gunderson only contains a portion of the pages originally attached. There were ten changes included in the letter.
14	Attachment 4					The document attached is not the PAM approved by CDPHE. This document should be replaced with the original PAM.

General	see Comment 8, 15, 16					Documentation is inadequate or incomplete.
8	10	4.0	5	3		How did CDPHE advise that no further action will be required in Sump 157? Recommend citing documentation of CDPHE approval.
15	Attachment 7					The Reconnaissance Level Characterization Report for Building 123 was submitted to CDPHE on August 11. Please replace this document with that one. The Administrative Record should contain the information upon which the removal action decisions are made. I believe the Administrative Record does contain the Characterization Report sent on August 11. What is the October 11 report?
16	Attachment 8					Recommend citing documentation of CDPHE approval.

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General	see comment				Editorial comments
3	1	2.1.1	1	1	Recommend replace sentence with : "An Environmental Readiness Evaluation was conducted prior to commencement of each of the three major project phases."
4	2	2.2	1	2	The material included as Attachment 6 is not an Economic Disposition Plan, but rather data gathered in implementing the EDP.
6	4	2.4.1	3	2	In the paragraph entitled "Removal of the Lead/Steel Vault" the clause saying the vault "was hauled to Lawrence Livermore in California" is inaccurate. The vault was transported by tractor-trailer to Oklahoma where it was refurbished under the direction of Lawrence Livermore National Laboratory.
11	13	13.0	1	item 5 line 3	Recommend reword "complicated coordination was complicated by"
