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Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Laboratory and Radiation Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
Phone (303) 692-2000 Denver, Colorado 80230-6928
TDD Line (303) 691-7700 (303) 692-3090
Located in Glendale, Colorado



Colorado Department
of Public Health
and Environment

<http://www.cdphe.state.co.us>

November 14, 2002

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, RFFO
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: RLCR for the Buildings 444, 445, 447, 448, 450, 451 and 455 at Rocky Flats Environmental
Technology Site (RFETS)

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has completed reviewing the *Reconnaissance Level Characterization Report (RLCR) for the 444 Cluster Closure Project Buildings 444, 445, 447, 448, 450, 451 & 455 (Revision 0, dated September 5, 2002)*. In accordance with Section 3.3.4 of the *Decommissioning Program Plan*, the Division hereby concurs with the determination that Buildings 445, 448, 450, 451 and 455 are Type 2 facilities. Additionally, the Division concurs that most of Buildings 444 and 447 are Type 2. However, our concurrence is subject to Division approval of work packages prior to conducting work on the following items:

- eight (8) large vertical vacuum casting furnaces located in rooms 10, 109 and 201 of Building 444;
- the old arc furnace located in room 405 of Building 447;
- the Retch Arc Furnace located in room 405B of Building 447;
- three (3) vacuum furnaces located in Room 403 of Building 447; and
- the chip roaster located in Building 447.

Work on the above listed items require Division approval due to the anticipated complexity involved with their decontamination and/or removal and the fact that the associated activities are non-standard. If RFETS is unwilling to accept this approach, then Buildings 444 and 447 will need to be reclassified as Type 3 facilities. Additionally, the Division has prepared several comments that are attached and need to be adequately addressed prior to conducting work related to the comments. If you have any questions regarding this matter please contact James Hindman at (303) 692-3345.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: S. Tower, DOE-RFFO
C. Freiboth, Kaiser-Hill
D. Shelton, Kaiser-Hill

T. Rehder, EPA Region VIII
D. Miller, AGO
Administrative Records, Building T1300



DIST.	LTR	ENC
BOGNAR, E.	X	
CROCKETT, G.		
DECK, C.A.	X	
DEGENHART, K.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D.W.	X	
FERRI, M.S.		
GERMAIN, A. I.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
MARTINEZ, L.A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A.M.		
POWERS, K.		
RODGERS, A. D.		
SHELTON, D.C.	X	
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N.R.		
WILLIAMS, J. L.		
Freiboth, C.	X	
Butler, L.	X	

COB CONTROL	X	X
ADMIN RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP

11/19/02 leg
Date By

Ref. Ltr. #

DOE ORDER #

5400-1

ADMIN RECORD

B444-A-000012

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CDPHE COMMENTS ON RLCR FOR BUILDINGS 444, 445, 447, 448, 450, 451, & 455
November 14, 2002

1. The Historical Site Assessment Report (January 2002, Rev. 0) documented interviews that indicated the possibility for enriched uranium or plutonium to be present in furnaces in Building 444. Since these furnaces have not been entered for characterization, these furnaces and any ancillary equipment including associated ventilation and exhaust systems will need to be characterized for enriched uranium and plutonium.
2. As discussed with facility representatives, Table 3.1 "Radiological Data Summary" contained errors and should have shown that upper walls and ceilings in survey areas E and G are contaminated above the uranium DCGLs. Thus, the statements that, "No contamination above the uranium DCGLs was found on walls (>2 meters from floor) and ceilings" and "No contamination above the uranium DCGLs was found above 2 meters" are incorrect in Section 3.0 "Radiological Characterization and Hazards."
3. The transmittal letter dated September 12, 2002 from Kaiser-Hill to DOE-RFFO is incorrect in stating that these facilities are acceptable for demolition or sale. These facilities will need to be decontaminated first.
4. The Division requests more information regarding the cadmium rolling and forming operations that occurred in Building 444 as mentioned in the Historical Site Assessment Report (January 2002, Rev. 0). When and where did these operations occur within Building 444 (i.e., rooms, equipment)? Have these rooms and equipment been characterized for cadmium?