

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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**Date/Time:** 09/01/04 – 0750 & 0921  
08/30/04 – 0730 & 0830  
08/24/04 - 1430

**Site Contact(s):** C. J. Freiboth (KH) – (CJF-079)  
**Phone:** (303) 966-2823

**Regulatory Contact:** David Kruczek, CDPHE  
**Phone:** (303) 692-3328

**Agency:** CDPHE

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**Purpose of Contact:** Building 447 Room 503 Pre-Demolition Survey (PDS) Data Disposition

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**Meeting Attendance:**

David Kruczek, CDPHE  
Duane Parsons, KH

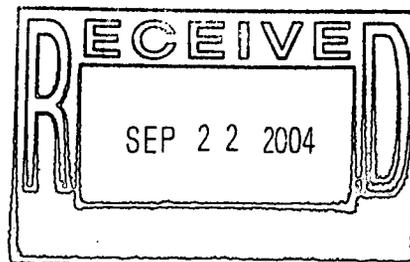
Karl Shuler, RFCSS  
Cameron Freiboth, KH

**Discussion**

Building 447 (B447) is a structural steel building with an exterior skin of transite panels. These panels are non-friable, Category 2 asbestos containing materials (ACM) that must be removed prior to demolition of the facility. The overall plan is to remediate the friable ACM, beryllium and radiological contaminants in the building's rooms so that the exterior transite panels can be removed which supports demolition of the building structure.

On August 24, 2004, at 1430, during a special Building 444 Complex focus meeting, a discussion was held with the State (Kruczek) regarding removing the transite panels from the south wall of Room 503 (located in B447). This room was an air heating and cooling room for supply air for B447. Supply air was drawn from outside the building through air intake vents in the south wall, and passed over heating and cooling coils before being forced (by supply fans) through the building's supply air ducts. It was noted that friable ACM has been removed from the room and that the room has passed the final ACM air clearance sampling. Radiological surveys confirmed that radiological (rad) contamination was less than action levels, except on a process waste drain pipe. The pipe has been removed except the vertical piece that passes through the 8-inch thick concrete floor. That small piece has been grouted closed to eliminate the hole. There was no removable rad contamination in the area following the grouting, but Residlock was applied on top of the grout and surrounding areas.

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During beryllium sampling, there was one elevated sample in the room, but it had been remediated via fixation. It was also noted that the eastern end of the north wall of R503 has been removed and replaced with plastic. All other openings between the room and the remainder of B447 had been sealed. Rooms 501 and 502 (which are west and north of R503) have had Residlock applied to their interior surfaces, and a rad survey indicates that there is no loose rad contamination in the room. Room 405B is east of R503 and is currently undergoing its pre-demolition survey.

On August 30, 2004, at 0730, additional beryllium and radiological data related to Room 503 were faxed to the State (Kruchek) for review.

On August 30, 2004, at 0830, during a telephone conversation with the State (Kruchek), the data provided earlier was discussed. Specifically,

1. Rad survey results from the interior of Room 503 showing no ( $<258$  dpm/100 cm<sup>2</sup> beta) removable rad (depleted uranium (DU)) contamination, and no fixed DU contamination.
2. Rad survey results from the west side of the cinderblock wall that forms the west wall of Room 503 showing no removable DU contamination, and fixed DU contamination ranging between 4500 and 7900 dpm/100 cm<sup>2</sup>.
3. Pre-demolition Survey (PDS) rad results from the Reconnaissance Level Characterization Report (RLCR) taken on the exterior surface of the Room 503 south exterior transite wall.
4. Beryllium survey results from 33 samples taken in Room 503. One floor sample on the eastern end was initially 0.179  $\mu\text{g}/100$  cm<sup>2</sup>, but following the application of Residlock fixative, the sample result was  $<0.1$   $\mu\text{g}/100$  cm<sup>2</sup>. Four follow-up confirmation samples around the initially elevated point were also  $<0.1$   $\mu\text{g}/100$  cm<sup>2</sup>.

The meeting included conversations related to ensuring that Section 3.8.1 of the RSOP for Component Removal, Size Reduction, & Decontamination Activities were addressed:

- (1) Relative Cost – N/A. The non-friable Category 2 transite must be removed before the structure can be demolished.
- (2) Structural Evaluation – Removal of the exterior transite panels from B447 poses no loss of integrity to the structural steel frame of the building.
- (3) Air Emissions – R503 is sealed off from the remainder of B447. In addition, it is surrounded by rooms that have been first cleared of friable ACM, and then fixed with Residlock, so that there is no removable radiological contamination. The sole elevated area of beryllium contamination was remediated, so there are no beryllium emission concerns. The removal of the exterior transite panels from the south wall should not result in the generation of additional dust, however, appropriate measures will be taken to prevent or minimize the potential for releases of contamination during this activity. These measures are discussed in the work package and include water spray in the work area to control dust. Personnel monitoring will be conducted during transite removal for asbestos. Radiological Control Technicians (RCT's) will monitor for rad contamination between the structural steel frame and the transite panels when they are removed.

- (4) Dust Generation – The room is currently open to the environment via slotted air intake vents. Transite removal should not result in the generation of additional dust, however, appropriate measures will be taken to prevent or minimize the potential for releases of contamination during this activity. These measures are discussed in the work package and include water spray in the work area to control dust. The potential for dust generation is low. Loose material has been removed, the area has been pressure washed. Panel removal is not expected to create any dust as the panels are unbolted during removal, instead of crushed or demolished.
- (5) Impacts to Surface Water – This activity will not impact surface or ground water, as large volumes of dust suppression (water) will not be used.
- (6) Impacts to Migratory Bird – A survey was conducted and the removal of these panels will not impact migratory birds or their nests.

The State (Kruchek) requested radiological swipe and fixed survey data around the process waste drain pipe that has been removed.

On September 1, 2004, at 0750, the additional rad data for the drain pipe was provided to the State (Kruchek) for review and disposition.

On September 1, 2004, at 0921, the State concurred that removing the panels exterior to Room 503 of B447 prior to structure demolition was the appropriate measure to be taken and could be initiated. This was based on the area being currently open to the atmosphere via the slotted air intake vents within the south wall transite, and the beryllium and rad survey data indicating the contaminants of concern are below action levels. This concurrence is also based upon the facility taking appropriate measures to prevent release of beryllium and rad contamination to the environment while conducting all work activities.

**Contact Record Prepared By: C. J. Freiboth**

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