



Department of Energy

ROCKY FLATS FIELD OFFICE
P O BOX 928
GOLDEN COLORADO 80402-0928

NOV 06 1998

98-DOE-01181

Mr Steve Gunderson
RFCA Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr Gunderson

The purpose of this letter is to apprise you of activities that the Department of Energy, Rocky Flats Field Office (RFFO) intends to undertake in Building 771 (B771) at the Rocky Flats Environmental Technology Site (Site) This work involves in part the removal of equipment that is potentially contaminated with radionuclides, and which is affixed to the floor and/or walls of B771, but which is not connected to the building's ventilation or plumbing

The work that we intend to perform corresponds to that described in Set 44 in the draft Decommissioning Operations Plan for B771 This work will take place in Rooms 178, 178A, 179, and 179A, and consists of removing idle machine tools, storage lockers, and spare parts The machine tools consist of lathes and drill presses that are attached to the floor The glovebox located in Room 179A will not be removed until the Decommissioning Operations Plan for B771 is approved No cutting tools will be employed to size-reduce the equipment being removed, we intend to perform only minimal mechanical disassembly prior to placing the equipment into waste crates for disposal While the equipment itself is likely to be largely uncontaminated, it is located in the contaminated area of B771, so we expect that some low levels of radiological contamination may be found on these items Photographs of the rooms are enclosed for your information, we anticipate beginning this work on or about November 13, 1998

The process governing the removal of this type of equipment is currently under discussion among our agencies As you know, we have proposed a modification to the Decommissioning Program Plan (DPP) to define the types of fixed equipment at the Site that may be removed without a building-specific decision document, and the process by which these removals may take place The activities that we intend to perform as part of Set 44 correspond to those described in our



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proposed modification to the DPP, and we intend to follow the process described therein. A copy of our proposed modification is enclosed for your reference. We do not believe, however, that the DPP, as currently written, or the Rocky Flats Cleanup Agreement preclude us from undertaking this work prior to modifying the DPP.

The RFFO and our contractor have discussed this work with staff from the Colorado Department of Public Health and Environment, and we believe they are familiar with the work to be performed. We will, of course, ensure that your staff has access to work packages, survey results, and other relevant information, and will inform them of the status and schedule for these activities.

If you have questions or need more information, please call John Rampe at (303) 966-6246. For specific information on the scope and status of work in B771, please call Joseph Springer of RFFO at (303) 966-4076. Thank you.



John J. Rampe
Decontamination and Decommissioning
Program Leader

Sincerely,



Regina Sarter
Rocky Flats Cleanup Agreement
Coordinator

Enclosures as Stated

cc (w/o Enclosures)
K Klein, DMTP, RFFO
H Dalton, AMMSD, RFFO
P Golan, AMPPI, RFFO

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J Legare, AMEC, RFFO
M McCormick, NFCG, RFFO
J Springer, NFC, RFFO
R Sarter, ERWMCP, RFFO
R DiSalvo, OCC, RFFO
S Bell, OCC, RFFO
F Gerdeman, PPI, RFFO
A Parker, K-H
D Shelton, K-H
B Mathis, K-H
G Meyer, K-H
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Mr Tim Rehder
U S Environmental Protection Agency
Region VIII
ATTN Rocky Flats Project Manager 8EPR-FT
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Dear Mr Rehder

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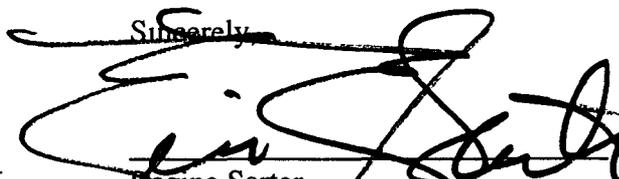
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Coordinator

Enclosures as Stated

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1 1 5 Removal of Certain Fixed Equipment or Systems under the DPP

This section describes the removal of certain fixed equipment and systems from Type 1, 2, and 3 buildings undergoing the disposition process. Fixed equipment or systems removal conforming with this section reflects agreement that no other RFCA decision document as described in Section 1.1.4. and Figure 1.1-1 is needed for this work. However, DOE and the LRA, will continue the consultative process regarding the removal of fixed equipment from buildings. The purpose of removing fixed equipment and systems as described in this section is to facilitate performance of the reconnaissance level characterization survey, to promote the timely disposition of excess useable equipment or the disposition of waste and to use available building manpower in an efficient manner.

For the purposes of this section, fixed equipment and systems means those items that are attached to the floor or walls or ceiling of a building, but which are not connected to building systems, such as plumbing or ventilation, that could reasonably be expected to provide a pathway for contaminants to reach the environment. Fixed equipment may be connected to utilities that do not provide such a pathway, such as electrical or telephone systems. As examples, fixed equipment includes machinery that is bolted or otherwise attached to floors or walls, cabinets, lockers, benches and electrical panels. Fixed equipment under this section also includes items such as hoods, gloveboxes and tanks that may have been attached to the building but never connected to building ventilation or plumbing systems. The need for a RFCA decision document for systems that have been connected, but which are uncontaminated, and for attached equipment inside of gloveboxes will be determined per Section 1 1 4-

Pursuant to this section, DOE may remove fixed equipment and systems as defined herein, regardless whether or not such equipment is contaminated with radiological or hazardous substances

DOE shall follow a removal process for fixed equipment and systems that ensures that such material is appropriately described, characterized and dispositioned. The fixed equipment and systems removal process will consist of the following documented steps

- 1) A preliminary radiological/hazardous substance evaluation, taking into account such factors as the operating history of the equipment and the area or building in which the equipment is located, will determine the need to perform additional characterization of the equipment.
- 2) If indicated by the preliminary radiological/hazardous substance evaluation, a radiological survey and /or hazardous substance characterization will be performed to determine if the equipment fits the criterion for free release
- 3) If the equipment is to be dispositioned as waste, the characterization is properly managed in accordance with the waste acceptance criteria for storage and/or disposal site

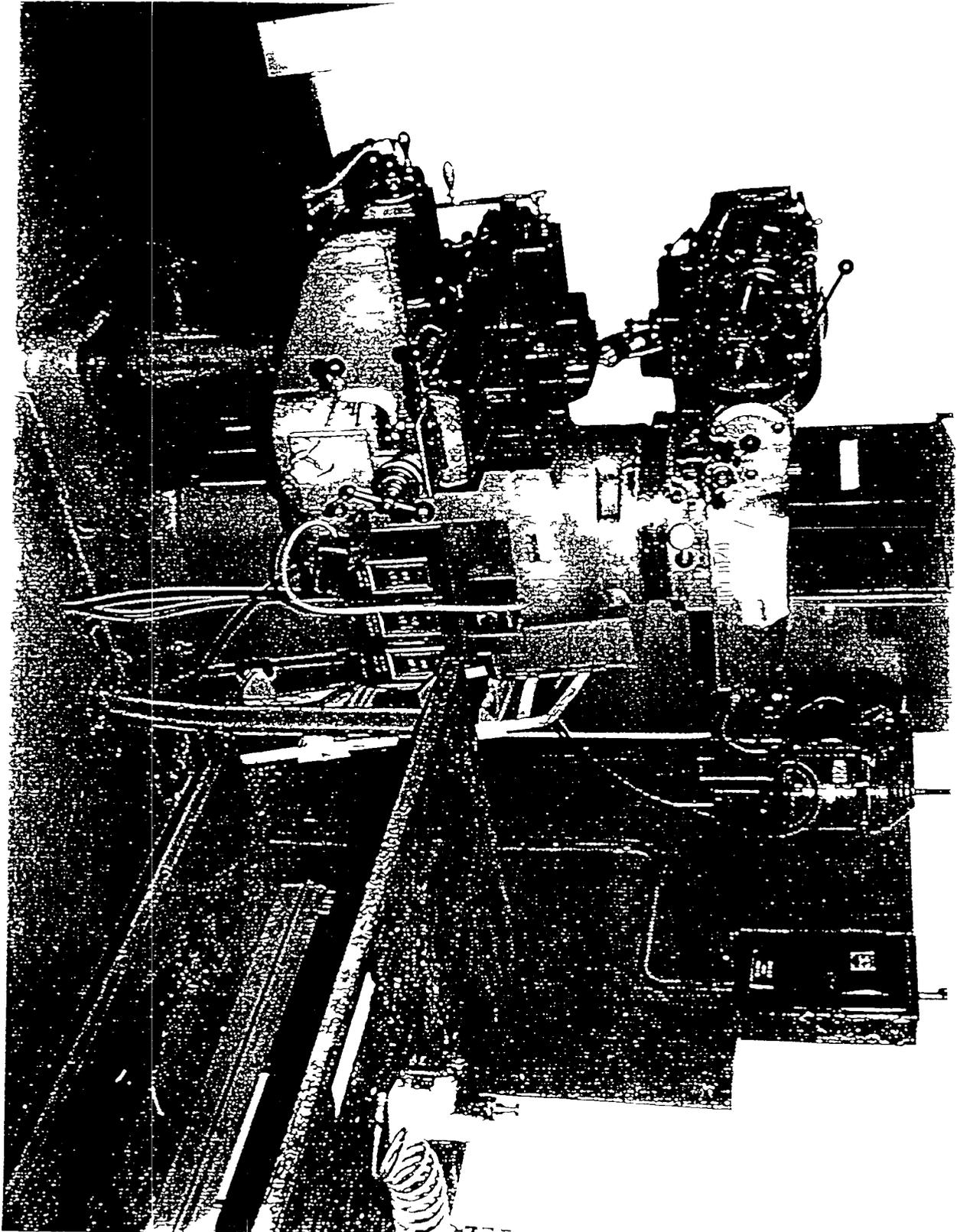
- 4) Removal of fixed equipment will be in accordance with Site radiological, hazardous substance and hazardous waste control procedures to control contamination-

(The decision to re-use fixed equipment and systems as defined in this section, either on-site or elsewhere, is solely DOE's. Removal of fixed equipment for re-use on-site or elsewhere in the DOE complex is mission-related work not subject to regulation under this DPP.)

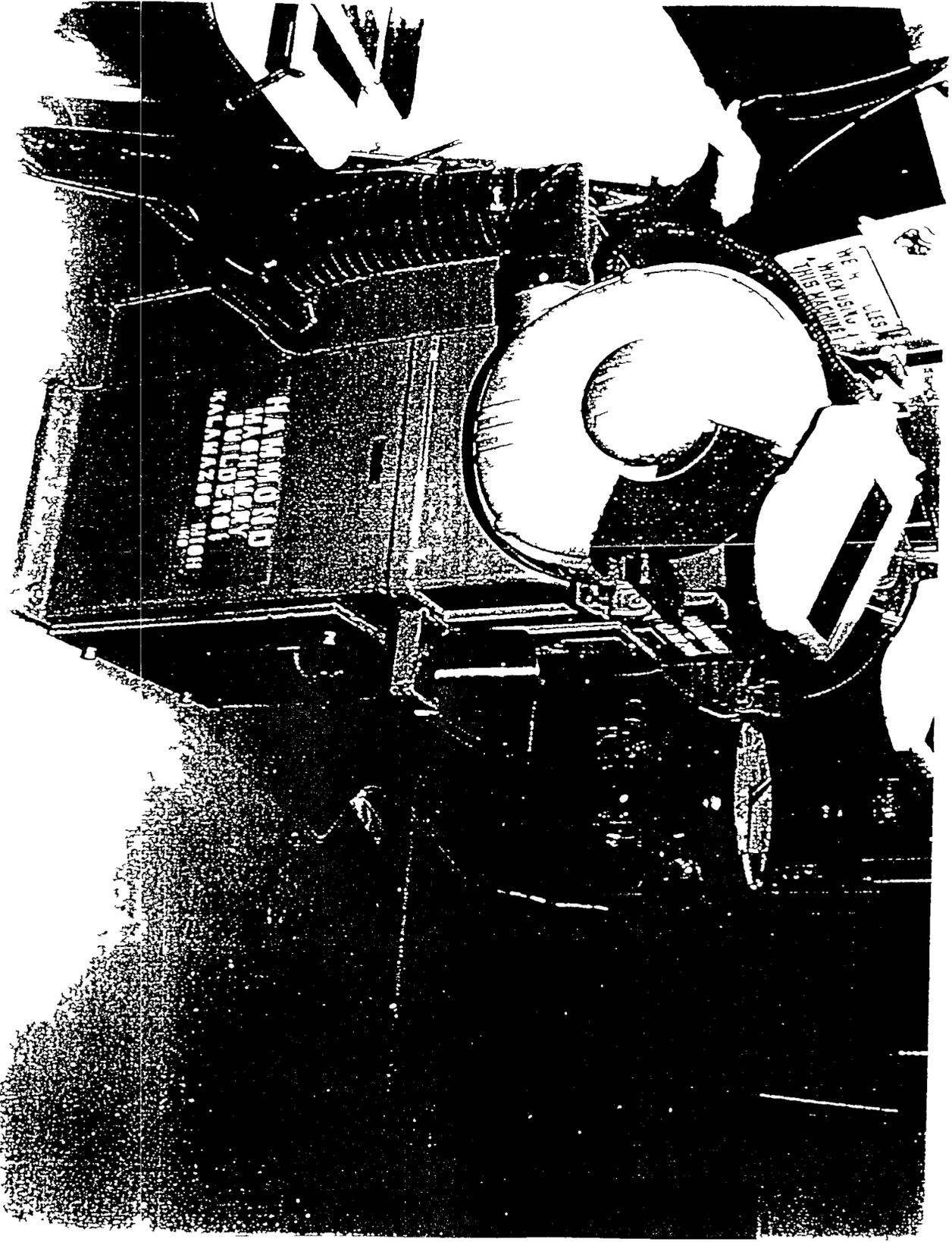
By implementing the process outlined above, DOE will ensure that fixed equipment will be characterized and dispositioned appropriately. Equipment containing greater than the free release limits of radionuclides or other hazardous substances will not be shipped to a sanitary landfill, nor released for unrestricted public use

DOE will ensure that site procedures are developed and maintained to govern the characterization and removal of fixed equipment. As an example, Health and Safety Procedure 18.10 governs the characterization and release of property and waste. Integrated Work Control Packages (IWCPs) are typically written for fixed equipment and system removal actions.

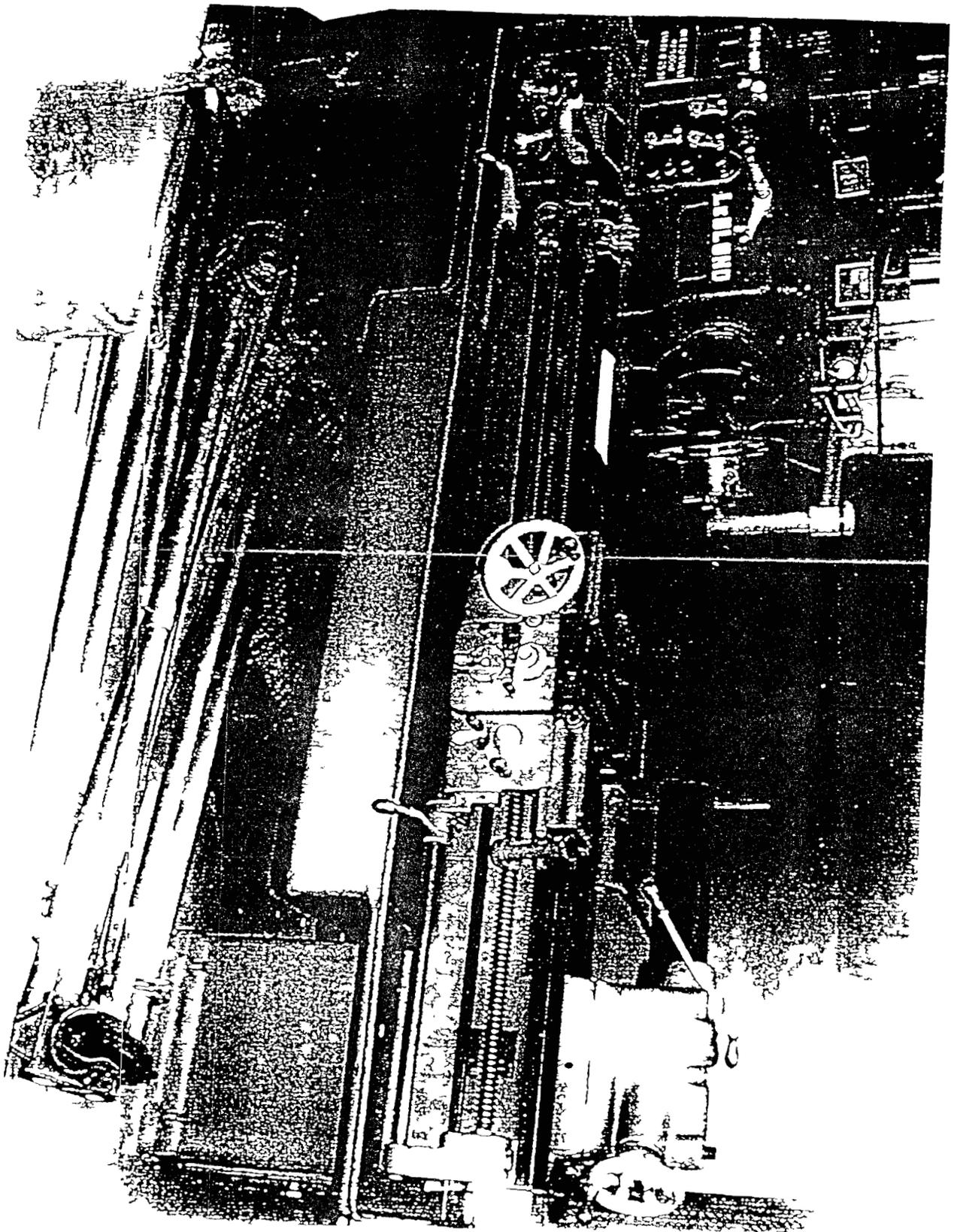
DOE will make available to the LRA on request any and all documentation relating to the characterization and removal of fixed equipment and systems, subject to classification requirements. Such documentation may include, but is not limited to, Site procedures, IWCPs, results of characterization, waste manifests, etc. Per Section 1.1.1 of this DPP, DOE, CDPHE and EPA encourage and expect an open dialogue among regulator, DOE and contractor project points of contact regarding the removal of fixed equipment. At the discretion of these project points of contact, this may include but is not limited to attendance at plan of the day or job pre-evolution meetings, sharing of daily operations reports, observation of work in progress, etc



BY R. Knack



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H. Knack



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