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November 6, 1998

Mr John J Rampe
D&D Program Leader
Rocky Flats Field Office
U S Department of Energy
P O Box 928
Golden, CO 80402-0928

Ms Regina Sarter
RFCA Project Coordinator
U S Department of Energy
P O Box 928
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**RE: Additional Comments on the Draft Building 771/774 Closure Project
Decommissioning Operations Plan (DOP)**

Dear Mr Rampe and Ms Sarter

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), received comments from the Environmental Protection Agency on November 3, 1998, as a result, we were unable to include their comments as part of our original October 26, 1998 submittal of comments We have reviewed EPA's comments and have included those that we believe warrant further consideration We recognize that the public comment period ended on October 28, 1998 but ask that you consider the enclosed comments in addition to our October 26, 1998 comments

If you have any questions regarding these comments, please contact Chris Gilbreath at (303) 692-3371

Sincerely,

Steven H Gunderson
RFCA Project Coordinator

Chris S Gilbreath
Building 771/774 Project Manager



cc D Miller, AGO
G Meyer, Kaiser-Hill
S Tarlton, CDPHE
T Rehder, EPA

ADMIN RECORD

IA-B771-A-00012

Building 771 Decommissioning Operations Plan (Revision 0 – 9/3/98) Comments

<u>Comment #</u>	<u>Section</u>	<u>Comment</u>
41	General	Throughout this document it states that workers will be properly trained, however there is no indication as to what these requirements are for the work being performed. We recommend incorporating a training matrix into this DOP similar to the Building 729 Training Matrix (Attachment 1)
42	4 2	This section discusses the process for how equipment will be selected, prioritized and dispositioned to meet the goals of closure. This section also identifies "weighting factors" used to provide preliminary prioritization. It is unclear how these weighting factors were developed and used in conjunction with Appendix 3. Provide a brief summary describing how the weighting factors were utilized during the development of Appendix 4.
43	4 7 1	Delete reference to 40 CFR 196 as this proposed rule was withdrawn December 19, 1996. Reference to RFCA should suffice.
44	Table 5-2	Modify this table to include preventative measures for beryllium and other potential hazardous materials (caustics, decontamination solutions, etc.)
45	5 3 3	This section should also describe air monitoring networks to be utilized during decommissioning activities to ensure workers are properly protected.
46	6 8	Fourth bullet, add "or used as fill on-site"
47	Table 6-1	Add industrial waste/rubble quantities.
48	9 0	As written, the Quality Assurance Strategy is inadequate. We recommend reviewing Section 10 of the 779 Cluster IM/IRA as guidance while revising this section (Attachment 2).

Table 5.1. Building 729 Training Matrix Requirements

Training Requirement	CM	CS	Waste	Craft
Alarms	✓	✓	✓	✓
Asbestos Awareness	✓	✓	✓	✓
Beryllium Indoctrination		✓	✓	✓
Building 729/779 Indoctrination	✓	✓	✓	✓
Computer Security	✓	✓	✓	
Confined Space*		✓		✓
Electrical Safety	✓	✓		✓
Fall Protection*	✓	✓		✓
GET	✓	✓	✓	✓
HAZCOM, General	✓	✓	✓	✓
HAZCOM, Job-Specific				✓
Safety & Health Plan Briefing	✓	✓	✓	✓
40 Hr HAZWOPER	✓	✓	✓	✓
8 Hr HAZWOPER Supervisor	✓	✓		
Hearing Conservation*	✓	✓		✓
Ladder Safety	✓	✓		✓
Lead Awareness	✓	✓	✓	✓
Control of Hazardous Energy (LO/TO)	✓	✓		✓
Radworker II	✓	✓	✓	✓
RCRA CBT	✓	✓		✓
RCRA Waste Management		✓	✓	✓
Respirator Indoctrination	✓	✓	✓	✓
Respirator Fit Test	✓	✓	✓	✓
Scaffolding Safety*		✓		✓
PAPR*		✓		✓
Waste Generator Classroom Review		✓		✓
WSRIC		✓		✓
Waste Generator Qualifications		✓	✓	✓
Medical Surveillance (Respirator)	✓	✓	✓	✓
Medical Surveillance (Beryllium)*		✓		✓
Medical Surveillance (Lead)		✓		✓
Medical Surveillance (HAZWOPER)	✓	✓	✓	✓

* Job specific, required as necessary

CM - Construction Manager

CS - Construction Superintendent

Waste - Waste Manager

10.0 QUALITY

10.1 INTRODUCTION

A contractor will be responsible for the management, control, and oversight of the 779 Cluster Decommissioning Project. The SSOC QA Plan (QAP) will be used to control and monitor the quality aspects of the project activities. The QA Plan will describe roles, responsibilities, and methodologies for ensuring compliance with DOE Order 5700.6C (the Order), and 10 CFR 830.120, (Price-Anderson Amendments Act, also known as the Rule). The 779 Cluster Decommissioning Project will follow the requirements of the set forth in the QAP.

10.2 PURPOSE AND SCOPE

The contractor's QAP will identify the strategy and controls currently employed, or to be developed and implemented by the contractor, to consistently deliver products and services that meet the requirements of customers and stakeholders. The QAP will serve as a map of the current controls employed by the contractor, and will present a concise strategy for the continuing development of the contractor's QA Program.

The QAP is relevant and applicable to the specific operations of the contractor and its subcontractors, and where applicable, to the interface controls between the contractor and Kaiser-Hill, and between the contractor and other Kaiser-Hill subcontractors. When Safety Class or Augmented Quality conditions exist, Project Management may decide to obtain subcontractors who have earned the "Approved Supplier" status. Approved suppliers are required to submit a quality program which meets equivalent standards to the integrator's QAP. The evaluation and approval of such programs is performed by K-H for placement into the Site Approved Supplier List.

10.3 PROGRAM REQUIREMENTS

The QAP will identify the QA elements of the QA Program and defines them in the context of implementing programs and controls. Specific programs and controls are also referenced in the QAP, such as floor level procedures, plans, and documents used to control all activities involved in the 779 Cluster Decommissioning Project. The QAP applies to all project personnel. Project personnel will understand the program's impact from training, indoctrination, and the commitment evidenced by management.

One of the primary aspects of the QA program is management involvement. The project will be implemented through a project management team. This criteria also includes self assessments by the management team.

10.3.1 QA Systems And Description

General

The contractor will require that decommissioning activities be appropriately planned in accordance with the provisions of the QAP, and that when activities deviate from planned outcomes and indicate significant conditions adverse to quality, personnel are required to stop the activity until corrections can be made.

All personnel are responsible for performing activities in accordance with approved documents, identifying and participating in quality improvements, customer interface, supplier interface, and processes with which they are associated. The project team is responsible for exercising stop work authority over significant conditions adverse to quality, and for attending training.

QA Organization

The QA Program is inherent to the work. This is accomplished during the planning of work, through the participation of Quality Engineers. Integration of the QA program at the onset of the project will reduce the need for extensive inspections and assessments. This early integration supports primary principle of a QA program whereby the achievement of quality is embedded in the work processes, and that assessment should only be a tool for monitoring quality and continuous improvement.

10.3.2 Personnel Qualifications And Training

Project personnel are qualified to perform their respective tasks based on a combination of related experiences, education, and training. Education and experience constitute the primary means of qualification. Decommissioning management, in conjunction with training program administrators, are responsible for providing any additional skills and training prior to assigning employees specific project duties. Typical training methods include computer based training, classroom instruction, required reading, and on-the-job training. Qualification requirements and training records are maintained and retrievable through the project manager. These records reside at a centralized training record repository.

The QA Manager establishes requirements for the competency of individuals planning, developing, assessing, and inspecting QA related work activities. Quality Engineers have the training, qualifications, technical knowledge, and experience commensurate with the scope and complexity of the decommissioning activities being evaluated. Evidence of competency, and maintenance of competency have been established and recorded in accordance with the QAP.

10.3.3 Improvement

Employee participation in the assurance of quality, and the continuous improvement process, is achieved through taking ownership of their processes, and actively seeking means to improve those processes. Decommissioning project management will use lessons learned in each phase of the project to improve succeeding phases. The project team approach is one of the management tools employed to enhance productivity and continuity throughout the project.

Items, materials and hardware that do not meet established requirements are identified, segregated, controlled, documented, analyzed and corrected in accordance with the Non-Conformance Reporting (NCR) process. Activities, services and processes that do not meet established requirements are also identified and corrected in accordance with the Quality Condition Reporting (QCR) process. Quality Engineers are responsible for supporting the NCR and QCR processes, and for assisting in the disposition and correction of identified deficiencies.

10.3.4 Documents And Records

Quality affecting documents, such as work plans, operating procedures, and health and safety plans are prepared and controlled in accordance with approved processes. These documents receive the required reviews and approvals, they are uniquely identified, and their distribution is formally established. Other essential policies, plans, procedures, decisions, data, and transactions produced by the contractor are documented to an appropriate level of detail. Document reviews by subject matter experts, management and Quality Assurance are performed as appropriate and as specified in governing procedures. Quality records are prepared and managed to ensure that information is retained, retrievable, and legible. The document and record processes for the 779 Cluster Decommissioning Project are the same as the established controls for all Engineering, Construction, Decommissioning and Facilities (E/C/D/F) projects, and are maintained in a consistent and approved method.

10 3 5 Work Processes

Decommissioning processes and activities are controlled to a degree commensurate with the risks associated with the decommissioning process or activity. Documented and approved instructions are incorporated to control decommissioning processes and activities, maintaining compliance with referenced standards, engineering specifications, workmanship criteria, quality plans or other requirements.

Work is controlled from the onset of the project through project management procedures, engineering procedures, records management procedures, construction management procedures, and work packages. The IWCP is the formalized process that controls the development of the decommissioning work packages. Established Waste Management Procedures and other controls ensure that the generation and handling of waste meets governing requirements.

10 3.6 Design

Sound engineering, scientific principles, and appropriate technical standards are incorporated into all design activities to assure intended performance. Site infrastructure programs, primarily the Conduct Of Engineering Manual (COEM), provide controls for the design of items and processes. Design work includes incorporation of applicable requirements and design bases, identification and control of design interfaces, and verification or validation of design products by independent, qualified individuals, subject matter experts or groups other than those who performed the work. The verification and validation is completed before approval and implementation of the design.

The design control processes for the 779 Cluster Decommissioning Project are existing and well established. The design control process is approved and documented through procedures for the control of design inputs, outputs, verifications, reviews, changes, modifications, and configuration change control. Design control requirements for procured design and engineering services are also incorporated into procurement specifications.

10.3.7 Procurement Of Items And Services

The Decommissioning Program implements a procurement and subcontracts system that complies with the appropriate protocols required by the Site. All procurement documents receive a documented independent quality review by Quality Engineers to assure incorporation of appropriate quality assurance requirements. The QA organization reviews procurement documents to ensure that the requirements for items and services are clearly depicted, including specific performance requirements. Procurement documents are retained and administered in accordance with approved procedures.

The contractor will employ control systems for identification, maintenance, and control of items, including consumables. The controls ensure that items are properly labeled, tagged, or marked, and that only appropriate items are used for the application. Controls ensure that items are identified, handled, stored, transferred, and shipped in a manner that prevents loss, damage, or deterioration.

10 3.8 Inspection And Acceptance Testing

Decommissioning activities or items that require inspections and/or acceptance testing will be specified in work-controlling documentation, such as IWCP work packages, operating procedures, and data management plans. Acceptance criteria and hold points are clearly defined, in accordance with approved procedures. Inspections are designed and controlled in accordance with approved processes. Oversight and acceptance of services is performed in accordance with approved documents by qualified personnel from the Decommissioning Program staff or by the designated Quality Engineer.

Testing is conducted when necessary to verify that items and processes perform as planned. Testing activities are planned and implemented in accordance with approved procedures that include provisions for performing the test, item configuration, environmental conditions, instrumentation requirements, personnel qualifications, acceptance criteria, inspection hold points, and documentation requirements for records purposes. Only controlled and calibrated measurement and test equipment are used for testing, measuring and data collection activities.

10.3.9 Assessment Program

The contractor will establish and maintain an assessment program and procedures for planning and implementing assessments. Assessments are scheduled by an independent branch of the QA organization, based on the risk and QA performance indicators of the activities being conducted. Assessments are conducted by qualified QA personnel, independent of the 779 Cluster Decommissioning Project. The results of assessments are documented, reviewed by appropriate management, and are tracked to verify development and effective implementation of corrective actions.

As previously indicated, the QA organization consists of personnel who participate with and are matrixed to the decommissioning organization. These personnel conduct monitoring and surveillance activities as a continuous barometer of quality assurance compliance and implementation. Decommissioning Program management also performs documented Management Assessments of the decommissioning organization to determine the effectiveness of the QA Program and overall organization performance. In addition to the assessments completed within the QA organization, the project management has established the following monthly reviews:

1. Review compliance with IWCP requirements, (2 packages-random selection)
2. Inspect for adequate training requirements, (5 people random selection)
3. Verify proper PPE is being worn, (10 people random selection)
4. Verify RWP requirements are being followed, (2 crews selected random)
5. Verify pre-evolution briefings are adequate, (2 crews selected random)

These inspections are documented in project logs, or in a formal report to the project manager.

11.0 FACILITY SECURITY

All the containerized SNM has been removed from Building 779 and the material access area (MAA) has been closed. Building 779 has been downgraded to a Nuclear Material Safeguards Category 3 building (clearance required for free access). After the completion of the SNM consolidation and deactivation activities, the building may be further downgraded to a Category 4.

The 779 Cluster can only be accessed through the PA. Individuals entering the PA must hold a DOE clearance or be escorted by a cleared individual. The 779 Cluster has been downgraded from a "Classified" plutonium facility to a "Class 3 Security" facility. Visitors must be escorted within the 779 Cluster by a building qualified individual. General public access to these facilities are not permitted.