



WESTMINSTER



November 3, 1998

City of Westminster
Department of
Public Works
and Utilities

4800 West 92nd Avenue
Westminster, Colorado
80030

303-430-2400
FAX 303-650-1643
TDD 303-428-0648

John Corsi
Kaiser Hill Communications
Rocky Flats Environmental Technology Site
Box 928
Golden, Colorado 80402-0928

Dear Mr. Corsi: *John*

Thank you for the opportunity to provide recommendations and comments on Decommissioning Operations Plan for Bldgs. 771/774. As you know, the city of Westminster is very concerned about the cleanup and eventual demolition of highly contaminated buildings at the site. Several former site workers have also contacted the City with their concerns on the D&D of building 771/774.

The strategic end points for building 771/774 Closure Project states that the material in the building is removed and the building is then ready for demolition leaving the slab. Leaving the slab behind is not supported. Because of the processes that were conducted in bldg. 771, the slab for that building has been painted over numerous times to cover radiation contamination. Additionally, there is a good chance that the slab may have become more permeable overtime allowing contamination to infiltrate the concrete

We therefore recommend that the slab is removed and the soils beneath the building are remedied during the demolition process. The tunnels that are in place between 771/774 and other buildings should be cleaned up and filled with clean fill rather than being capped. Former workers have indicated that these tunnels are contaminated from years of use and should not be left in place. Overtime there is a potential for tunnel caving and migration of contamination that could eventually pose a threat to surface water.

Remedy selection such as capping has the potential to end up with institutional controls left for the community to maintain. It is therefore important that the local governments surrounding the site be involved in any remedy selection that has the potential for generating controls

2

The community needs to be made aware of the tradeoffs involved in the various cleanup strategies. Spending more money up front on cleanup may result in less cost to the taxpayers for maintaining controls.

The 779 building D&D project has been a safe, successful and timely operation under the competent management of Mr. Mike Korenko. It is recommended that because of his experience and dedication to a safe cleanup process that he be named as the project building manager for building 771/774 cleanup and closure efforts. It is very important to our city that the work control people assigned to this highly contaminated building be experienced and that the radiation control staff is properly trained.

Radiological characterization of the building should include a detailed plan for measuring the degree of contamination in the cinder block walls in the area where the fire in building 771 occurred. There is a high probability that the permeability of the concrete blocks was increased due to the intense heat of the fire. Former site workers have indicated that the blocks may contain high levels of plutonium oxides. Proper characterization of the walls will provide information that can be used to ensure that the community is protected from the risk of oxides being liberated to the air during cleanup and demolition activities.

Because of the risks to the community from taking down highly contaminated buildings, it is recommended that the various contractors utilized during the building DOP process be brought in at the beginning of a project to ensure that they are well informed and have been part of the process from the beginning. In order, to ensure the safety of the workers, community and the environment a team approach should be utilized for all D&D activities.

Page 4-5 under Reconnaissance Level Characterization interjects the fact that building 790 was recently added to the 771/774 cluster and that the decommissioning work scope will be part of the 771/774 cluster. As bldg 790 is not contiguous to the cluster please provide justification as to why it was added to this project.

3

Disposal and storage of waste generated during the D&D activities for 771/774 is a concern. There is no mention of where the material will be stored on site waiting final disposition. We recommend that buildings slated for D&D be reviewed for their ability to store wastes. Building of facilities for waste storage is not compatible with cleanup and closure and is therefore not supported. Please provide a copy of the plan for storing the waste generated by the D&D of 771/774.

Sincerely,



Mary Harlow, Rocky Flats Coordinator