

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: December 28, 2004 / 9:00 A.M.

Site Contact(s): Bob Cathel
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Regulatory Contact: Edd Kray
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Agency: CDPHE

Purpose of Contact: Disposition of B776/777 Survey Units 29 & 30

Discussion

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and dose and risk to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare the Second floor Survey Units 29 and 30 for demolition. Survey Unit 29 consists of rooms 225, 227 (south half) and 228. Survey Unit 30 consists of rooms 201, 206, 207, 213, 220, 226 and 227 (north half).

The preparation process for Survey unit 29 was initiated June 30, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

- Concrete shaving was performed on floor and wall surfaces.
- Expansion joints and cracks in the floor were remediated, as necessary.
- Ceiling panels were remediated, as necessary.

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey unit 29. The following summarizes the non-radiological activities:

- Chemicals and hazardous substances have been removed
- Only room 227 in Survey Unit 29 was listed on the historical list of rooms with potential beryllium contamination. Room 227 was on the historical list because the internals to the plenum systems were presumed to be beryllium contaminated.

The baseline beryllium characterization of these rooms conducted by KH in 1999 found no removable beryllium contamination. Subsequent surveys following equipment removal have found no removable beryllium present in this survey unit. Prior to final encapsulation the room was again surveyed. Eighteen (18) samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm². Since no removable beryllium was detected prior to encapsulation, no further sampling is required.

- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.
- No RCRA units requiring closure were associated with this survey unit.

The preparation process for Survey unit 30 was initiated July 14, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

- Concrete shaving was performed on floor surfaces.
- Expansion joints and cracks in the floor were remediated, as necessary.
- Ceiling panels were remediated, as necessary.

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey unit 30. The following summarizes the non-radiological activities:

- Chemicals and hazardous substances have been removed
- Only room 227 in Survey Unit 30 was listed on the historical list of rooms with potential beryllium contamination. Room 227 was on the historical list because the internals to the plenum systems were presumed to be beryllium contaminated. The baseline beryllium characterization of these rooms conducted by KH in 1999 found no removable beryllium contamination. Subsequent surveys following equipment removal have found no removable beryllium present in this survey unit. Prior to final encapsulation the room was again surveyed. Twenty-two (22) samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm². Since no removable beryllium was detected prior to encapsulation, no further sampling is required.
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey Units 29 and 30 has progressed to the point of

reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey Units 29 and 30 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. This contact record will be included as an appendix to the characterization report for Survey Units 29 and 30 and placed in the demolition file to ensure the controls and requirements are included in the demolition work packages for these survey units.

Contact Record Prepared By: Bob Cathel

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