



**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD**

COPY

Date/Time: January 20, 1999 / approximately 10:033 a.m.

Site Contact(s): Mike Conilogue **Phone:** 966-6152

Regulatory Contact: Chris Gilbreth **Phone:** 692-3371

Agency: Colorado Department of Public Health & Environment

Purpose of Contact: Discuss proposed modifications to the 779 Decommissioning Operations Plan.

Discussion: Chris had concerns with proposed modifications to the 779 DOP which would omit Gloveboxes NC-7 and 106-6 (Unit 90.39) from closure requirements.

A prior request to defer NC-7 to closure under D&D had been submitted to CDPH&E (DOE Ltr 97-DOE-05206). No deferral for closure request had been submitted to CDPH&E for GB 106-6. I informed Chris that neither of these GB's had ever stored hazardous waste and the request to defer NC-7 was an error. Chris then suggested a letter to file be generated stating this and requested he be e-mailed a draft. I told Chris I would cc: mail K-Hill the draft and the normal flow of correspondence would follow. Chris was agreeable that the current modification to the 779 DOP would suffice in omitting GB 106-6.

We then discussed a future modification in which crushing of hazardous waste fluorescent bulbs would be conducted in 779. Chris stated it was his understanding the 779 DOP specifically stated bulbs generated in 779 would be taken to another Building and crushed. He stated the only change to the DOP should state that bulbs may be crushed in 779, and specifics such as how the waste would be managed, a description of the crusher, etc. was not necessary. Chris was also somewhat receptive to the idea of manually size reducing radioactively contaminated bulbs (double bag and tap with a hammer) to allow packaging, but said he would like to talk with his associates first.

Finally, I suggested that 779 could solidify the crushed bulbs on-site with a sulfur cement or "Envirobond", which would render the waste stream non-hazardous. Chris was also receptive to this idea, but requested that a statement requiring submission of a waste analysis plan be included in the DOP.

I ended the conversation informing Chris that a face-to-face would be held with himself and Ed Kray during which all current proposed future DOP modifications would be discussed.

Contact Record Prepared By: Mike Conilogue, RMRS/779 Technical Support

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