

United States Government

Department of Energy

memorandum

Rocky Flats Field Office

DATE: October 6, 1997

REPLY TO
ATTN OF: OCC:TSH

SUBJECT: Draft Decommissioning Operations Plan (DOP) for the Decommissioning of the Building 779 cluster (September 1997 Version) (Second Review)

TO: Dave Nickless, MSD, RFFO

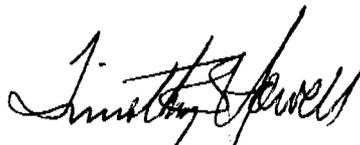
The draft Decommissioning Operations Plan (DOP) for the decommissioning of the Building 779 cluster has been reviewed (September 1997 Version). I offer the following comments in addition to those provided in blue ink on the attached copy of the document. Please note that many of these comments are identical to ones this office made in its review dated July 9, 1997 and provided to Mr. Bill Prymak, ESD. These comments may be shared with appropriate contract personnel.

1. This version of the draft DOP provides a more focused discussion of reasonable alternatives, however, there is no discussion of the "No Action" alternative and more details are needed on the alternatives listed (see specific comments on the attached draft). This version of the DOP also provides more focus on what specifically the proposed action is, but there appears to be some indecision over whether some technologies will or will not be used. In cases where the specific technology to be employed is still in doubt, it would be beneficial to include these technologies in the proposed action so the impact analysis can be as complete as possible. It is more prudent to have a technology evaluated and not used then to retrofit in a technology at a later date when the relative impacts have not been assessed.
2. Reference Section 1.0, Purpose: Recommend deleting 1.0.1 and 1.0.2; recommend moving 1.0.3 to 9.4.1, page 81 as indicated by my notes on the enclosed draft; and move 1.0.4 to follow the introduction.
3. Reference all discussions of ventilation systems: It is unclear what the proposed decommissioning activity relates to. If the phrase ventilation system refers to the ducts or the holdup in the duct work, then there may need to be further programmatic discussions over what is deactivation and what is decommissioning.

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4. Reference all discussion on PCBs: Does the Site have an EPA approved sampling plan for paint containing PCBs? It is unclear in the DOP what sampling plan the Site plans to use with respect to paint containing PCBs. It is my understanding that Melanie Pearson is the EH POC at DOE HQ and that Tony Baining is the TSCA Group POC at EPA HQ. Also, I have made specific comments relative to the disposal of PCB containing paints.
5. Reference all discussion of "excess chemicals" and "idle equipment": Note that the Site now has two new consent orders which address these two topics. The DOP should be updated to reflect the requirements of these two consent orders. Also, the correct reference is "waste chemicals" and not "excess chemicals". Furthermore, please note that activities associated with the waste chemical and idle equipment consent orders are technically neither decommissioning nor deactivation activities. Items deferred from these consent orders to decommissioning, however, are technically decommissioning activities and will be covered under the DOP.
6. Reference 2.0: Recommend deletion of 2.0 through Figure 2-1. This section deals wholly with internal Site procedures and as such is not appropriate for inclusion into a document being approved by the regulators.
7. References to residual levels of radionuclides in the soil: I am unaware of any negotiations on-going with the Department or the Site regarding residual levels of radionuclide activity in soils. The soil action level is established for what the minimum level of radionuclide activity that can be left in the soil once a building has been reduced to rubble. This action level does not establish the degree to which a building must be cleaned before it is demolished. I am, nonetheless, mindful that the Rocky Flats Citizen's Advisory Board has asked for an independent review of the soil action levels.

Point of contact on this matter is the undersigned and I may be reached at telephone extension X2027.



Timothy S. Howell
Office of Chief Counsel

Attachment
cc w/o Attachment:
B. Fitch, EC, RFFO
F. Gerdeman, PCD, RFFO
B. Prymak, ESD, RFFO

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