

CORRES CONTROL
OUTGOING LTR #

DOE ORDER #

05-RF-00926



DIST	LTR	ENC
CROCKETT, G		
FERRERA, D.W.	X	X
GILPIN, H.E.		
LONG, J.W.		
LINDSAY, D. C.		
SHELTON, D.C.		
TUOR, N.R.		
SNYDER, D		
PLAPPERT, R. D.		
GILLESPIE, D. R.		
NESTA, S.	X	X

October 6, 2005

05-RF-00926

Richard J. Schassburger, Director
Headquarters Cadre Project Management
DOE, RFPO

TRANSMITTAL OF RESPONSE TO COLORADO DEPARTMENT OF HEALTH AND ENVIRONMENT (CDPHE) COMMENTS OF DECOMMISSIONING CLOSEOUT REPORT FOR THE 883 CLOSURE PROJECT -- DWF-104-05

Enclosed are the responses to CDPHE comments on the Final Decommissioning Closeout Report for the 883 Closure Project. Also enclosed are five color copies of a revised drawing to accompany copied reports.

Transmittal to the CDPHE and the Environmental Protection Agency, in accordance with the Rocky Flats Clean-Up Agreement, is requested. Also, please submit a color copy of the enclosed drawing.

If you have any questions, please contact Steve Nesta at extension 6386.

CORRES.CONTROL	X	X
PATS		
ADMN. RECORD	X	X
WASTE REC CTR		
TRAFFIC		

Dennis W. Ferrera

CLASSIFICATION:
 UCN1
 UNCLASSIFIED
 CONFIDENTIAL
 SECRET

Dennis W. Ferrera
 Vice President and Project Manager
 Remediation, Industrial D&D, and Site Services

AUTHORIZED CLASSIFIER SIGNATURE: SMN:rlm

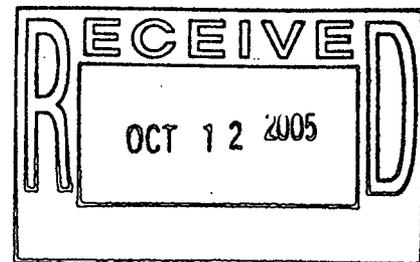
NA
Date: Enclosure:
IN REPLY TO RFP CC #: As Stated

ACTION ITEM STATUS: Original and 1 cc - Richard J. Schassburger

PARTIAL/OPEN
 CLOSED
cc:
John Rampe

LTR APPROVALS:
(Last Name) _____
(Last Name) - _____

ORIG. & TYPIST INITIALS:
SMN:rlm
Letter # DWF-104-05



ADMIN RECORD

Kaiser-Hill Company, L.L.C.
Rocky Flats Environmental Technology Site, 10808 Highway 93, Unit B, T130F, Golden, CO 80403-8200 ♦ (303) 966-6386

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1. Section III – Last Bullet states that all NPWLs and OPWLs were removed. Please expand this discussion to identify the extent of this removal and that there remains some in ground process waste lines from B883 next to the VV west of B883.

RESPONSE:

All new process waste line (NPWL) from B883 to valve vault (VV) 2 was removed. NPWL from VV2 to VV3 was clean closed and left in place. Original process waste line (OPWL) P-9 was totally removed from B883 to a point west where the line depth is 4.7 feet below grade surface. From this point P-9 is grouted 75 feet to the manway at B889 at 6.4 feet below grade.

2. Section V – Since the slab did have radiological contamination above unrestricted release criteria associated with joints and cracks, please properly modify to explain the last sentence.

RESPONSE:

Contamination on wall and floors remained but was provided a fixative to meet unrestricted release conditions. During the demolition process and during removal of the slab numerous radiological surveys were taken but never indicated a detectable radiological release. The slab and one foot of gravel were subsequently removed but surveys taken never indicated any radiological release during the process.

3. Section VIII – Since there remained radiological contamination that was also above the unrestricted release criteria, please modify this discussion to recognize this concern also.

RESPONSE:

Section VIII is amended with this response, as follows:

PDS results indicated that radiological contaminants existed in excess of the PDAP unrestricted limits, and the project personnel used fixatives to immobilize loose radiological and beryllium contamination. This debris was subsequently managed as low-level /PCB bulk product waste.

Additionally, PCBs existed in excess of the PDSP unrestricted release limits in two locations – the A-side USI pit, and the East Annex Pit 4. This waste was managed as low-level/PCB remediation waste.

4. Section IX –
 - a) This discussion needs to include the remaining parts of the building, including the remaining foundation footers/columns as well as the 883/881 tunnel and remnant basement wall.
 - b) Please add a discussion regarding the removal and remaining process waste lines and their condition.
 - c) Please include a discussion of the condition of the water and sewer lines (flushed, plugged, etc).
 - d) Please discuss the condition of the foundation drain lines.

SUMMARY OF B883 CLOSEOUT REPORT RESPONSE TO COMMENTS TO CDPHE

- e) Please include a discussion of the condition of the removed and remaining parts of B883 and B879, including slabs, sidewalks, driveways, etc.

RESPONSE:

Section IX is amended to add the following detail:

- The B883 slab and numerous concrete equipment pads were removed
- The hydraulic elevator shaft was removed but the casing around the cylinder remains. The 12 to 13 foot long casing is approximately 15 inches in diameter with the top of the casing 15 feet below ground surface.
- The Loewy rolling mill foundation was partially removed. The remaining foundation is greater than 16 feet below grade surface.
- All new process waste line (NPWL) from B883 to valve vault (VV) 2 was removed. NPWL from VV2 to VV3 was clean closed and left in place. Original process waste line (OPWL) P-9 was totally removed from B883 to a point approximately 4 feet east of VV2 where the line depth is 4.7 feet below grade surface. From this point P-9 is grouted 75 feet to the manway at B889 at 6.4 feet below grade.
- Room 138, room 139, and the steam pits were all removed.
- The 2,000-ton press pits were removed but the four caissons which supported the press pit remain 3 feet below grade surface.
- The Cincinnati shear pit and pad were removed.
- All transformer pits and pads were removed.
- Foundation column pads attached to bedrock remain, but all columns were removed.
- The tunnel between B883 and B881 remains in place with both ends of the tunnel sealed to disrupt the groundwater pathway. A cinderblock wall was constructed at the inner door of each end. A small section of the building foundation was left in the southwestern corner of B883 to provide structural support to the tunnel. The top of the tunnel is greater than 3 feet below grade surface.
- Sanitary lines under and adjacent to B883, as well as the lift station south of B883, were removed.
- Storm and foundation drains under and adjacent to B883 were removed. The storm drain southeast of B883 remains and is greater than 3 feet below grade surface.

5. Section X - Since there was a huge excavation to remove as much of the building as possible that ultimately filled with water, this should be discussed.

RESPONSE:

Water was collected into FRAC tanks and shuttled to B891 where it was sampled prior to treatment. All water was managed appropriately. Approximately 45K gallons were treated at the Central Waste Treatment Facility (B891).

6. Section XI - Since at least some of the process waste line was not removed, this is remaining waste that needs to be discussed. Also please include a statement as to the condition of the remaining building structures, and sewer lines.

RESPONSE:

See responses to #1 and #4 above. The attached figure depicts the remaining infrastructure left within the footprint of the facility.

7. Section XII - Please provide the completion dates as well as the start dates.

RESPONSE:

Demolition Activities: Started February 12, 2005, Completed April 7, 2005
Rubble removal: Started April 20, 2005, Completed May 27, 2005
Slab removal: Started April 7, 2005, Completed May 27, 2005
Demobilization: Started May 27, 2005, Completed June 10, 2005

8. Section XIV - Please modify this discussion as this implies that ER will perform activities not included in this Report, even though the results of the ER activities appear to be included in this report. Since ER and D&D worked together to remove the slab and below grade sections of B883 and 879, this Closeout Report should include all activities and final configuration of the 883 Cluster. Although it would be best to have the appropriate info provided in this report (and sufficient info needs to be provided, even if duplicated), rather than simply regurgitating the ER Closeout Report, it would be appropriate to recognize the existence of the ER Report (provide specific reference) as reference for additional information. Still need to provide at least minimal information with additional details and figures to be found in the ER Report.

RESPONSE:

This section is amended to incorporate a summary of information which is consistent with ER Closeout Report for IHSS Group 800-3, June 2005. Essentially, the B883 slab, all equipment pads, and concrete pits, air tunnels and connections to the plenum building (879), and foundation columns were removed. Structures remaining include deep column pads, a portion of the rolling mill foundation, four caissons under the eastern 2,000-ton press pit, the tunnel between B883 and B881, and a small section the B883 foundation to support the remaining tunnel. All structures that remain are not contaminated.

9. Figure 5 (or another figure to be provided) needs to show the disposition of the foundation drains and associated sumps. Also, please provide a figure showing all remaining infrastructure (footers/pedestals, 881/883 tunnel and associates walls, etc.). In addition it is our understanding that not all of the process waste line was removed, and that a small segment remains next to VV2, which may be shown but it is not possible to tell the difference between the removed and remaining lines. Please modify this figure, specifically the legend, to properly identify the different lines and when they remain or are removed.

RESPONSE:

The process waste line from B883 to VV2 was removed and indicated by hatched line on Figure 5. An additional figure from the ER Closeout Report for IHSS Group 800-3, June 2005 (their Figure 7) is provided that identifies the infrastructure that remains.

SUMMARY OF B883 CLOSEOUT REPORT RESPONSE TO COMMENTS TO CDPHE

10. Request a summary of the RCRA Closure information for B883.

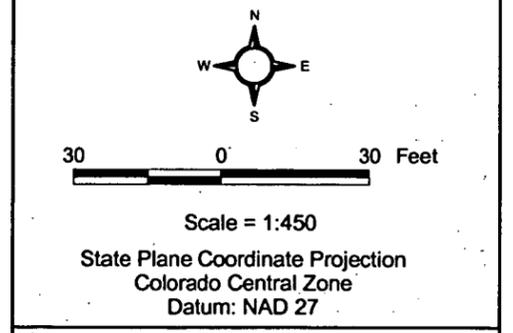
RESPONSE:

All RCRA units associated with B883 were either previously closed under separate closure summary reports (as identified in the RCRA Master List) prior to D&D activities, or are identified in this report. All components have been removed and managed appropriately.

Figure 7
IHSS 800-3
Structural Features Removed and Remaining

KEY

	Removed building
	Removed tank
	Remaining valve vault
	Remaining tunnel
	Remaining Pit Foundation
	Removed Pit Foundation
	Remaining column
	Removed NPWL
	Remaining NPWL
	Removed OPWL
	Remaining OPWL
	Removed sewer line
	Remaining sewer line
	Removed foundation drain
	Remaining storm drain
	Removed drain
	Remaining storm drain
	Removed buttress beam
	Paved area
	Stream, ditch, or other drainage feature

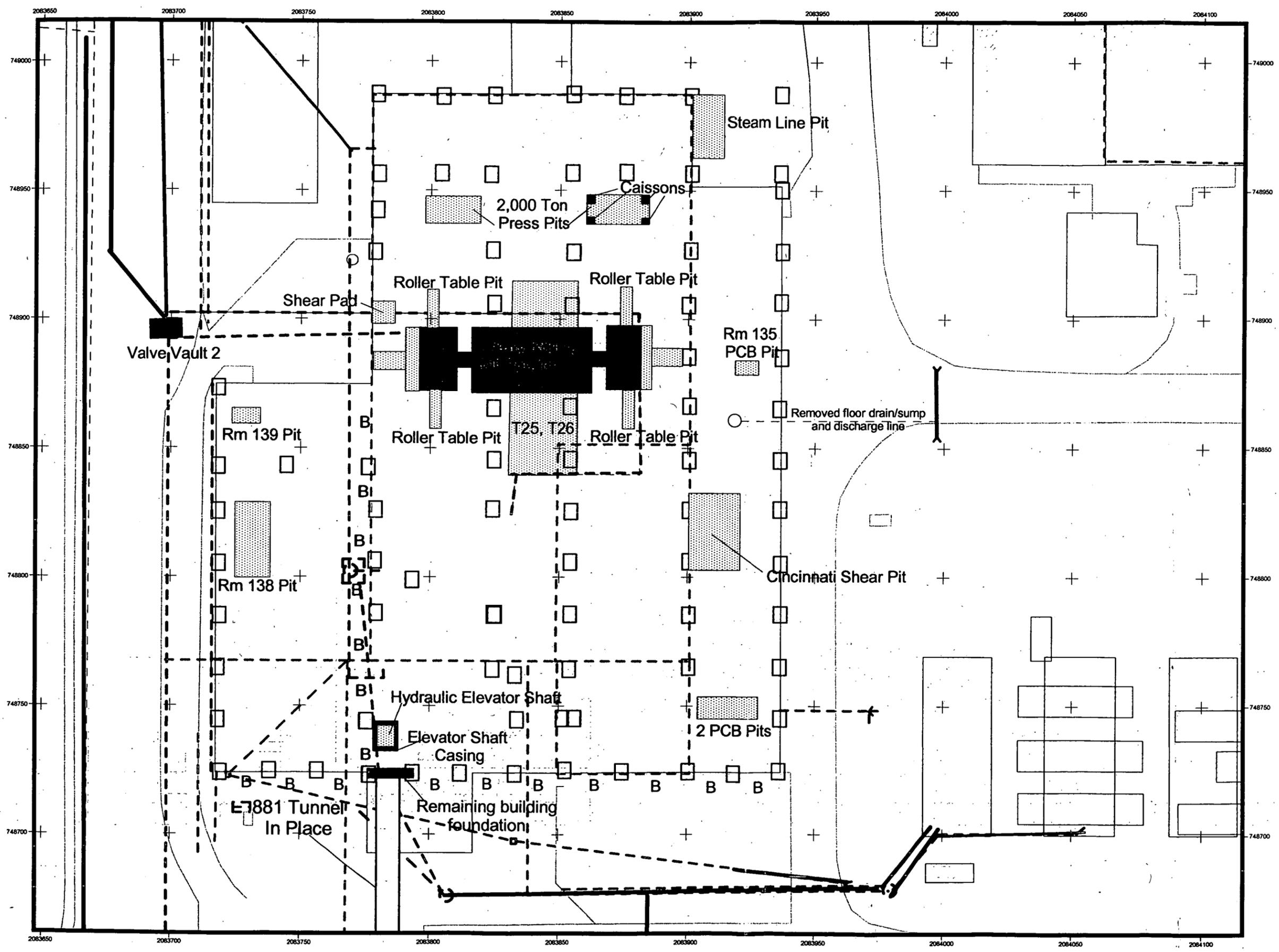


U.S. Department of Energy
 Rocky Flats Environmental Technology Site

Prepared by:  Date: May 2005

Prepared for: 

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