



Rocky Mountain
Remediation Services, L.L.C.
... protecting the environment

000062174

INTEROFFICE MEMORANDUM

DATE: June 7, 1996

TO: Paul Bengel, RMRS Vice President, T 130F, Ext. X2535

FROM: Mark Hickman, RMRS Project Manager, T130F, X7145 *MEH*

SUBJECT: BUILDING 889 DECOMMISSIONING PROJECT'S IMPLEMENTATION
PLAN - MEH-003-96

Action: None

PURPOSE

The purpose of this correspondence is to forward a copy of the referenced Implementation Plan. The plan is being supplied for your information.

DISCUSSION

The attached Implementation Plan was developed to identify how various issues confronting me in the completing the subject project are being addressed/resolved. The implementation plan is used as a planning tool. The actual work documents are/have been developed per the appropriate RFETS procedures. For example, although the implementation plan discusses the flow of work in dismantling Building 889, the actual work document which controls the work is an Integrated Work Package (IWCP) developed from an approved Engineering Order (EO). The Implementation Plan is currently being reviewed against the requirements of the DOE Decommissioning Resource Manual. My intent is to revise the Implementation Plan, as necessary to comply with the guidance provided in the DOE Resource Manual.

RESPONSE REQUIREMENTS

No response requested. This document is being provided for your information.

MEH:dlu

cc:

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ADMIN RECORD

IA -A-00035



Rocky Mountain
Remediation Services, L.L.C.
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Building 889 Decommissioning Project

Implementation Plan

Revision 0

Rocky Mountain Remediation Services, L.L.C.

Prepared By: _____ / _____
Mark Hickman
Project Manager
Date

1996

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
PROJECT IMPLEMENTATION PLAN FOR
DECONTAMINATION AND DECOMMISSIONING OF BUILDING 889**

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ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE PROJECT IMPLEMENTATION PLAN FOR DECONTAMINATION AND DECOMMISSIONING OF BUILDING 889

1.0 INTRODUCTION

This project plan describes the fundamental strategy that will be used to remove the above ground structures of Building 889 under the Decommissioning program at Rocky Flats Environmental Technology Site (RFETS).

The purpose of this project plan is to: 1) provide background information on the construction and past uses of Building 889, 2) describe the activities to be conducted as part of this project plan, and 3) explain the environmental concerns that will be considered during the planning and implementation of this action.

For the purpose of this document, "Building 889 containment" or "containment area" will refer to the contaminated portions of Building 889. The containment area is described in Paragraph 1 of Section 2.0 and shown in Figure 1.

The proposed action will accomplish the following:

Substantially reduce the potential risk to human health and the environment resulting from release of radioactive contamination contained within the non-operating Building 889.

- Verify the effectiveness of decontamination and dismantlement techniques on metal and concrete structures.
- Assist in developing an approved plan for implementing Decommissioning activities at RFETS.

2.0 BACKGROUND INFORMATION

Building 889 was originally designed and constructed in late 1960s with approximately 2,750 square feet covered. Building 889 was used as an equipment decontamination and repackaging facility for the uranium and beryllium manufacturing operations. The original building foundation is poured reinforced concrete spread footings and grade beams approximately 4' 0" deep. The

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exterior walls are constructed of concrete masonry units (CMU). The roof over this area is made of prestressed concrete twin tees spanning east west. The permanent equipment in Room 108 consists of a bailer/crusher and monorail. Room 106 features a steam cleaning unit, two process waste sumps, a monorail, eyewash station and miscellaneous (non-permanent) cleaning tools.

The remaining rooms were for building electrical equipment, ventilation/filter room and administrative spaces. This building provides the containment for all building operations and is the only portion of the building which has existing contamination. Radiological surveys of the facility have only detected contamination in Rooms 105, 106, 107 and 108. All other areas are radiologically clean.

Later, shower-locker facilities (Rooms 110 and 111) were added to the south end of the facility. The showers enclose approximately 613 square feet. The foundation of the addition is a 3' 6" deep grade beam with 18" diameter x 7' deep caissons located at the new columns. The building addition is a framed structure with six tube steel columns. Steel wide flange beams span between the columns and steel roof joists support the steel deck roof. The addition is a free standing structure. The exterior walls are enamel coated steel siding with interior insulation supported by steel framing. The interior of the walls are framed with metal studs and finished with gypsum board with painted finish. Another part of this construction effort was the addition of a mezzanine in the older part of the building's office area (discussed above). No contamination exists in the shower area and this addition will be removed prior to decommissioning the containment area. Removal of the shower facility does not affect the integrity of the Building 889 containment.

A ventilation equipment upgrade building Room 112) was added as an extension to Building 889 in 1988. The addition is a two-story room on the east side of Building 889 containing approximately 2,390 square feet of space. The foundation is a grade beam with 18" to 24" diameter x 28' deep drilled caissons. The new floor is a concrete slab on grade. Underneath the slab are 1'-9"x 2'-0" tie beams for structural frame. The supporting structure is a ridged steel frame with pre-formed insulated metal siding. The roof is a built-up roofing system. This additional structure is also free standing. Inside this area there is a steel framed mezzanine which supports a heating ventilation and air conditioning (HVAC) unit and filters. The Room 106 monorail system was continued into Room 112. This part of Building 889 was never put into service. No

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contamination exists in Room 112 and this addition will be removed prior to the proposed action. Removal of Room 112 does not affect the integrity of the Building 889 containment.

A temporary trailer (T889A) is located just west of Building 889. The trailer is used as an additional shower and toilet facility. No contamination exists in the shower trailer. Trailer 889A will be removed prior to decommissioning of the Building 889 containment. Removal of the shower facility does not affect the integrity of the Building 889 containment.

3.0 PROJECT DESCRIPTION

The scope of this action will only focus on the above ground portions of Building 889. The free standing additions adjacent to the containment area will be removed during decontamination of the containment area. The RCRA units within Building 889 will be addressed in a separate project plan and RCRA closure plan during Operable Unit 9 (OU 9) remediation.

This project plan will achieve the following objectives:

- The building will be characterized for hazardous and radiological constituents using sampling/ analysis results and historical information to verify that there is no risk to worker's health and safety or to the environment in completing the proposed action and to assist in proper handling of the dismantled material;
- A shower trailer (T889A), adjacent to Building 889 will be removed from this area;
- Floor and sanitary drains will be closed and sealed as appropriate;
- Water and electrical systems will be locked/tagged out (drained) and eventually removed;
- All equipment will be removed from the building;
- Materials containing asbestos will be abated and dispositioned appropriately;

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- Any materials/wastes characterized as hazardous will be removed and managed per 6 CCR 1007-3 Sections 260-268;
- The ventilation system, including the High Efficiency Particulate Air (HEPA) filters, will be removed and appropriate decontamination efforts completed;
- The building additions which are not contaminated will be removed;
- All radioactive contamination will be removed or fixed in place using approved Decommissioning work practices and procedures;
- The containment area will be removed.

3.1 Project Issues

RCRA permitted Unit 40, encompass the Building 889 (B889) two sumps and the waste transfer line connecting the sumps to Tanks #4 & #5 located in Building 866, is a concern of the decommissioning action. These auxiliary system components are scheduled to be closed in accordance with State of Colorado RCRA closure requirements after the demolition of the above-ground structure of Building 889. The closure action on these components will be accomplished during the environmental remediation of the OU 9, which address this system and the below-ground structure of the industrial area, such as, B889 will be after decommissioning.

To protect this RCRA unit's auxiliary components and to avoid the spread of contamination, protective measures will be taken. A water tight cap will be placed over the sumps to contain the hazardous constituents and prevent any dust or debris from falling into the sump. According to the previous building manager, these areas were cleaned and capped with tile and grout in approximately 1989. The unit's transfer system piping needs to be verified drained and blind flanged.

Prior to removal of the CMU wall; radiological contaminated floors and walls will be scabbled and/or scarified as necessary to achieve the criteria established in RFETS 4-Q97-REP-1003, "Radiological Evaluation For Unrestricted Release of Property/Waste". Areas having only

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radiological contamination will be managed in accordance with approved RFETS low-level waste handling procedures.

Debris treatment will be utilized on areas that met the definition of debris and contain a hazardous constituent. Debris residues, i.e., concrete scabbling debris removed during implementation of these debris treatment technologies will be characterized, as applicable, and managed appropriately. Once the surfaces requiring treatment are decontaminated, sampled, and properly characterized, the building containment structure will be dismantled. Management of all building material is discussed in the Building 889 Waste Management Plan.

Once the shell of the building is removed, clean surfaces will remain exposed to the environment. All drains, grates, trenches, and sanitary waste lines will be closed and/or sealed. Surface water run-on and run-off will be monitored as part of the Industrial Area Interim Measure/Interim Remedial Action program surface water program.

The scope of work covered by this document will be controlled through an Integrated Work Control Program Plan, a Health and Safety Plan, appropriate Sampling and Analysis and Demolition Engineering Surveys.

4.0 ENVIRONMENTAL REQUIREMENTS

4.1 Waste Management

Waste for this action will be managed in accordance with all applicable state and federal regulations. An estimate of the different types of waste that may be generated is presented in the Building 889 Waste Management Plan. The solid waste from the demolition activities will be placed in roll-off containers or a similar type of container.

Solid waste will be evaluated for recycling, then placed in the on-site or an off-site landfill. Low level waste (having only radiological contamination) will be stored on-site and shipped to the Nevada Test Site (NTS), or another authorized facility for disposal. Low-level mixed waste (waste having both radiological and RCRA hazardous contamination) will be handled in

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accordance with 6 CCR 1007-3 Sections 260-268 and stored appropriately pending eventual treatment/disposal.

4.2 National Environmental Policy Act (NEPA) Considerations

This action was evaluated for impacts to the environment (including, but not limited to, wetlands, floodplain, threatened or endangered species or their habitats, and historic or cultural resources) in the spring of 1995. A Department of Energy/Rocky Flats Field Office NEPA Regulations Subpart D Categorical Exclusion (RFO/CFX23-94A) was granted on June 12, 1995, indicating that any adverse impacts to the environment will be minimal.

4.3 Work Conducted in Individual Hazardous Substance Sites (IHSSs), Potential Areas of Concern, and RCRA Units

Although these activities will be completed on and near Operable Units 9 and 14, no soil is expected to be disturbed in the associated IHSSs. Completion of the activity and removal of trailer (T-889A) will allow for easier access to IHSS's 121 and 164.3 for future environmental investigations in this area.

Tank 40, located north of Building 889, will be remediated under the "Accelerated Action Plan and Agreement for IAG Underground Storage Tanks containing RCRA-Regulated Materials", and therefore is not included in the scope of this project plan.

Ancillary equipment associated to RCRA Unit 40 (the operation process waste line system) is located below grade level of Building 889 and is part of the process waste collection system of Building 889. The process waste collection system includes two sumps and piping that served as collection areas for waste from steam cleaning operations in Room 106. The Building 889 associated RCRA units discussed above will be closed during future activities in compliance with the RCRA closure plan specified in the permit.

4.4 Additional Environmental Considerations

An Air Pollution Emission Notice (APEN) review for both non-radionuclide air pollutant emissions

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(Asbestos and Beryllium) and radionuclide air emissions, as required by 40 CFR Part 61 will be conducted before the activity commences. Additionally, appropriate measures will be taken to protect surface water and sanitary sewer systems during all the activities discussed in this project plan. These measures include closing and sealing all floor drains, maintaining a spill kit within the building, and evaluating analytical results from the automated surface water monitoring stations located at the perimeter of this site. Sampling of the building ventilation discharge stack will continue until the system is removed from service for decontamination and demolition.

Building 889 has been fully characterized for asbestos and a final report is being generated. Asbestos was found on the roof of Room 112 and the CMU. Additionally asbestos was found in some of the thermal insulation in Room 104. A state certified contractor will be hired to remediate the asbestos.

The painted surfaces in Building 889 have been sampled for lead. The sample results indicate that there are a number of locations painted with paint containing lead. The AHAs for activities involved with these surfaces identify/require appropriate personnel training, protection and monitoring to complete the lead paint disturbing activities. The Building 889 horizontal surfaces which were to be accessed in completing this project were cleaned to remove any dust potentially containing lead.

Historical information on Building 889 indicated that Beryllium was introduced into the building. Smear samples were/are being taken to identify the appropriate personnel protective and monitoring requirements. The AHAs incorporate these requirements for a specific activity if it is required. The sampling information will become a part of the final Building 889 sample/characterization report.

Radiological hazards are evaluated on a continuing basis. The results of these evaluations are used in preparation and update of the radiation work permits (RWPs) and building postings. The RWPs and building postings include personnel monitoring and protection requirements. Property release forms will be used to release any material from the building area.

Excess building chemicals are being removed from the building in accordance with approved RFETS procedures. Material safety data sheets are used to identify any potential safety hazard

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in handling the material. Packaging and transfer of each chemical to an appropriate storage location is identified individually. This project will not introduce any new chemicals into the building.

5.0 COMPLIANCE WITH HEALTH AND SAFETY STANDARDS

The Health and Safety Implementation Plan described in this section reports how the project activities are and will be controlled to maintain a safe work place using the philosophy of Best Management Practices to ensure compliance with applicable Department of Energy (DOE) Orders and other applicable laws and regulations. The project has been determined to be a demolition effort. Therefore, the 29 CFR Chapter XVII section 1926.850, Subpart T, (Demolition) requirements apply. The following steps describe the management controls and activity sequences which have been setup to ensure compliance with the applicable regulations.

5.1 Project Specific Health and Safety Plan

A project specific Health and Safety Plan has been developed and included in the Building 889 Integrated Work Package. Each project activity is being evaluated through the use of Activity Hazard Analysis (AHAs) as described in the Building 889 project specific Health and Safety Plan. The AHAs focus on the potential hazards associated with each activity and identify the mitigating and protective measures which are to be implemented for the activity. The hazards associated with each work activity are minimized to the greatest extent practicable. Electrical energy sources are isolated by de-energizing (and disconnecting/cutting electrical power wiring). High pressure/temperature energy sources are isolated by de-pressurizing and draining all piping systems before work is started on the particular component. Lockout/Tagout (LO/TO) requirements are contained within the AHA. The LO/TO requirements within the AHAs are used to de-energize all electrical systems and to isolate, de-pressurize and drain piping systems before breaching the system boundaries. Each AHA is reviewed with the employees and become part of the Health and Safety Plan. This ensures the employees are aware of the hazards in their work place.

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5.2 Engineering Surveys

An initial Engineering Survey was conducted by a professional engineer civil engineer during the development of the Engineering Orders (EOs) which form the basis for the Building 889 equipment removal and demolition instructions. The EOs were used in creating the Building 889 Equipment Removal and Building Demolition Integrated Work Control Packages (IWCPs) and have been included as an appendix to the applicable IWCP. The EO text and drawings indicated that the equipment within the building could be removed and the internal walls within the shower room could be removed without affecting the building's structural integrity. The majority of the building equipment in Rooms 106, 108, 112, and the shower room interior walls have been removed using AHAs to isolate electrical lines and de-pressurize/drain piping systems before the removals. The remaining equipment will be removed using job specific AHAs to control the activities.

The initial Engineering Survey did not forecast the need to remove a section of wall between Rooms 106 and 108 in order to get the large pieces of equipment out of Room 108. Although the initial EO information indicated the wall in question was a non-load bearing wall, a job specific Engineering Survey was employed to evaluate actions required for the activity prior to the wall removal. The Engineering Survey focused on a safety envelop placed around the area of the wall section in question and the effect of removing the wall section on the building structural integrity. Based on the Engineering Survey, electrical power for lighting (located near the ceiling) does not present a hazard to personnel removing the wall section and was not de-energized. Electrical power wire contained within conduits near the wall section were de-energized. One low voltage, (<50 volts), alarm circuit (part of a smoke detection circuit for trailers T690 A & B) is contained within a conduit located near the ceiling. The alarm circuit was not part of the demolition effort and deemed not to be a personnel hazard, this is consistent with RFETS guideline for work on energized circuits. The alarm circuit was moved away from the wall to ensure it would not be affected by the wall section removal. To ensure potential hazards in completing this evolution were properly evaluated an AHA was completed and approved prior to the wall removal.

An Engineering Survey will be completed, by a subcontractor, for the removal of the shower area main structure. The preliminary engineering survey information indicated that the shower area was constructed as a stand alone structure. All electrical power circuits to the shower area of the

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building has been physically isolated by disconnecting/cutting the source wiring. One low voltage, <50 volts, alarm circuit remains. The alarm circuit is contained within a 4" conduit which comes out of the ground next to the south west corner of the CMU wall. The conduit raises to approximately 7' and turns to penetrate the CMU wall. If this conduit were damaged during demolition and the internal wire damaged, a firewatch will be available to be put in place of the then out of service smoke detection circuit for Trailers 690 A & B. Work personnel would still not be exposed to harmful voltage. There is a high power electrical line near the south west side of the shower structure which will be de-energized prior to dismantling the shower structure.

Although no personnel will be allowed into the CMU while the shower structure is being dismantled, the electrical power to the CMU will remain functional to maintain ventilation for the radiologically contaminated section of the building. All piping systems within the shower area have been isolated, de-pressurized and drained. An AHA will be written for this activity after the Engineering Survey is complete.

Two more Engineering Surveys will be completed for this project:

One survey will evaluate the removal of Room 112 and the other will evaluate the removal of the CMU walls. The preliminary survey information indicated that the Room 112 area was constructed as a stand alone structure. All electrical power to the Room 112 area has been physically disconnected/cut and all Room 112 piping systems have been isolated and de-pressurized. Room 112 will be physically separated from the CMU prior to being dismantled. Additionally other potential hazards, i.e., steam system piping near the East wall will be evaluated in the Engineering Survey for this section of the building. Although no personnel will be allowed into the CMU while the Room 112 structure is being dismantled, the electrical power to the CMU will remain functional to maintain ventilation for the radiologically contaminated section of the building. An AHA will be written for the Room 112 removal after the Engineering Survey is complete.

The last Engineering Survey will be completed for the CMU structure. The preliminary engineering survey information indicated that the CMU area was constructed as a stand alone structure. The two adjoining structures (Shower area and Room 112) will have been removed prior to removal of this structure. Electrical power to the CMU will be maintained to complete

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decontamination efforts. Removing electrical power from this area before decontamination is complete would potentially create safety hazards due to temporary cables running through doors which should remain closed to maintain the correct building ventilation flow and minimize the potential to spread contamination. The Engineering Survey and AHA prepared for the CMU demolition will dictate that: 1) After completion of decontamination and before the CMU walls are removed, all electrical power will be de-energized and physically severed from their power source, and 2) All piping systems will be isolated, depressurized and drained.

6.0 ORGANIZATION

The following personnel are designated points of contact for this project. If any of these personnel can not be reach for question in their specific assignment, contact the project manager for assistance.

6.1 Project Management

Mark Hickman is the Project Manager and is responsible for the overall coordination of activities necessary to complete the Building 889 Decommissioning Project.

6.2 Engineering

Brian Henderson is the Project Engineer. Brian is responsible for resolving technical issues which be encountered during the completion of the Building 889 Decommissioning Project. Brian will work with all the supporting organizations to ensure minimal impact to project schedule due to unforeseen conditions/problems.

6.3 Construction Management

Ron Heitland is the Construction Manager. Ron is responsible for coordinating all the craft work activities in Building 889. Ron will set daily work priorities and work through the craft foreman, Chris Lee, to complete the activities.

6.4 Radiological Operations/Controls

Radiological issues will be addressed on two levels: 1) radiological engineering, and 2) radiological control technician.

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6.4.1 Dennis Russell is the Radiological Engineer supporting the project

The Radiological Engineering group will:

- Complete radiation work permits.
- Complete radiological ALARA reviews.
- Coordinate the completion of property release forms.
- Assist in design/procurement of containment/sleeving to be used for piping draining and ventilation system removal, where required.
- Provide technical direction to the Radiological Controls Technicians.

6.4.2 Radiological Controls Technicians (RCTs).

- RMRS will provide RCTs to cover project activities, (names to be determined).
- Work with the Construction Manager to establish daily priorities.
- Complete routine and project specific surveys to help maintain the project schedule.

6.5 Project Craftsmen

This project will be completed by Steelworker Union personnel and a subcontractor, J. A. Jones. Steelworker personnel will complete all decontamination efforts and remove contaminated equipment. Subcontract personnel will remove uncontaminated components and dismantle the building structures. The project will be completed on the day shift.

6.6 Waste Management Support

Gary Bracken is the primary contact for D&D projects. There were 21 crates in Building 889, packaged before the project was started by RMRS. These crates will be moved to Building 664 for storage until shipment off site. The Building 889 Waste Management Plan describes how the waste in this project will be managed.

6.7 Security

A security checklist has been submitted to Wackenhut identifying the scope of this project and how the project is intended to be completed. All work supporting Building 889 will be complete outside the protected area. No special security requirements have been identified at this time.

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6.8 Building Operations Personnel

Building 889 has been transferred to RMRS for demolition. All previous operations have been terminated.

6.9 Training

George Bigger is the RMRS Training Coordinator. Building 889 specific training is currently being arranged for RMRS project personnel. Additional project specific is being completed.

6.10 IWCP Preparation

Jim Gay is the IWCP planner for this project. The Intergrated Work Control Plans for this project have been completed.

6.11 Sampling & Characterization

Sampling and characterization of project related hazards will be coordinated by Dick Sexton. Dick will assist in completing the sampling/characterization report. The report will describe specific actions which were taken as a part of this process.

6.12 Health and Safety

Ken Jenkins is the project's Health and Safety representative. Although all activities completed by this project are governed by the Rocky Flats Health and Safety Manual, a project specific Health & Safety Plan has been developed. The PASS Project's Health & Safety Plan was written to identify and place more of a safety focus on the project specific hazards. Industrial Hygiene support is arranged through Ken Jenkins.

6.13 Quality Assurance/Control

David Warfield is the RMRS Quality Assurance representative. David is responsible to ensure the project is completed in accordance with all applicable quality assurance requirements. All project person are responsible for maintaining proper quality controls within their areas of responsibility and as a total project.

6.14 Budget and Schedule Controls

Maria Martinez is the project's Budget and Schedule Analyst. Maria reports directly to the Project

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Manager for project related tracking and reporting issues. The project milestones are identified in the Building 889 Decommissioning Schedule.

6.15 Environmental Regulations Compliance

Gary Guinn is the focal point of all environmental compliance issues. Gary has reviewed this project, determined the regulatory interfaces and what actions are required to maintain RMRS in compliance with the various environmental regulations. The appropriate actions have been incorporated into the project schedule.

7.0 IMPLEMENTATION SCHEDULE

The project activities are scheduled to begin in the winter quarter of 1996, and is expected to be completed by September 30, 1996.