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CORRES. CONTROL
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United States Government

Department of Energy

Rocky Flats Field Office

memorandum

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DUE DATE 11-30-94

ACTION STIGER

NOV 04 1994

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL



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DIST.	LTR	ENC
BURLINGAME, A.H.		
BUSBY, W.S.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MARX, G.E.		
McDONALD, M.M.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STIGER, S.G.	X	X
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		
DE MASS, T	X	
TOME, A	X	
HOLLOWELL, L	X	X

ER:VW:11239

Revision to the Building 889 Decontamination and Decommissioning Pilot Scope of Work

Sue Stiger, Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

As you know, the principal current Rocky Flats Decontamination and Decommissioning (D&D) program effort is in the D&D pilots. These pilot projects were envisioned as a means to test a broad range of technical and management methods that will be used in the cleanup of Rocky Flats.

The seven pilots fall into three categories. Pilot projects numbers 1, 2, and 4 are small, relatively low risk projects with little or no radiological contamination, selected to establish a program team, develop management systems, and demonstrate the ability to execute smaller D&D projects to the appropriate Environmental Restoration (ER) standards. Pilot project number 5 (Building 889) is a smaller building with modest uranium contamination, selected to demonstrate facility and concrete decontamination technology and management approaches, as well as the ability to resolve Resource Conservation and Recovery Act (RCRA) and Interagency Agreement interfaces, organizational interfaces, and regulatory concerns. Pilot project numbers 6, 7, and 8 are rooms with plutonium-contaminated gloveboxes, selected to demonstrate the ability to safely and efficiently decontaminate, size reduce, and dispose of plutonium-contaminated equipment which will be the biggest and highest-risk cleanup scope at the Site. These projects also will fully integrate deactivation and D&D activities.

The overall objective of the pilots is to support the ER D&D program development effort, and demonstrate technical and management approaches that can be implemented in the subsequent full-scale program. The pilots should demonstrate methods, techniques, and procedures to accomplish the cleanup mission in as fast, easy, safe, and a cost effective manner as possible. These objectives are stated in more detail in Attachment 1, Project Technical Objectives. Efforts must be made to ensure both that the results of the pilots are collected and that those results are integrated appropriately into the program.

The definition of the regulatory process for D&D has become a major issue in the negotiation of the RFCA. The DOE proposed, separately from the original D&D pilots, that a pilot or demonstration project be conducted to allow the development of a D&D regulatory process to be incorporated in the RFCA. The final RFCA regulatory process would be determined based on the lessons learned from this demonstration. After evaluation of several alternatives, the expansion of the scope of the Building 889 pilot was determined to provide the best way to support this regulatory process development. Therefore, the scope of the Building 889 pilot project should be changed to total facility demolition, instead of just the D&D of the equipment and interior, as described in Attachment 1. Additionally, please

CORRES. CONTROL	X	X
ADMIN RECORD 080	X	X
PATS/130G	X	

Reviewed for Addressee
Corres. Control RFP

11-7-94 RDM
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DOE ORDER # 5400.1
4700.1

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initiate any transfers of contractual responsibility for the operations, surveillance, and maintenance activities as necessary to best support these changes in project scope.

In response to this change in scope, please provide revised cost and schedule information and how you intend to achieve the acceptance criteria within three weeks of receipt of this memorandum. Also, you are requested to develop the format and presentation of the data and document deliverables developed by the RFCA Demonstration project to support the D&D program. The exact form of such documentation should be the subject of further discussions at the staff level.

If you have any questions, please contact Vern Witherill at extension 7003.


Jessie Roberson
Assistant Manager for
Environmental Restoration

Attachment

- cc w/o Attachment:
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V. Witherill, ER, RFFO
R. Schassburger, ER, RFFO
W. Fitch, ER, RFFO
B. Williamson, ER, RFFO
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T. Bearden, SAIC
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T. De Mass, EG&G
A. Tome, EG&G



Attachment 1
RFCA D&D Demonstration Project
Scope and Objectives

Scope

- 1) Develop and receive regulatory approval of a Building 889 D&D Proposed Action Memorandum.
- 2) Decontaminate, remove, and properly dispose of equipment from Building 889.
- 3) Decontaminate the building structure of hazardous and radioactive contamination.
- 4) Close all Building 889 RCRA units, including tanks T-4 and T-5 in Building 866.
- 5) Close Building 889 sumps associated with OU-9 and cap lines 5 ft. from the foundation.
- 6) Support under building contamination determinations and removal actions as necessary.
- 7) Demolish structure.
- 8) Remove foundation.
- 9) Certify no manmade structures remain within the building perimeter.
- 10) Support the RFCA determination of regulatory approach.
- 11) Coordinate with the Industrial Area IM/IRA.
- 12) Relocate T889A.
- 13) Plan and execute the project according to ER-MSA requirements.

General Project Objective

Establish approach, develop methods, and achieve success against project technical objectives while decontaminating, decommissioning, and demolishing Building 889, and support incorporating these approaches into the overall D&D Program. Demonstrate methods, techniques, and procedures to accomplish the cleanup mission in as fast, easy, safe, and cost effective manner as possible.

Project Technical Objectives

- 1) Demonstrate regulatory and compliance policies and processes, using a graded approach as they will be applied in Rocky Flats D&D, and resolve any resulting issues.
- 2) Develop, test, and revise as necessary specific procedures for accomplishing the physical D&D and associated work.
- 3) Develop data (such as cost, resource requirements, decontamination efficiency, waste generation, etc.), estimate bases, and preferred schedule logic that can be used in planning the remainder of the D&D program.
- 4) Identify acceptable conditional and unconditional release criteria, both for removed equipment and remaining facilities, and establish acceptable means of achieving and verifying these levels.
- 5) Establish management systems and organizations to properly manage, control, and report both the pilot and future D&D projects.
- 6) Provide specific lessons learned documenting successes, failures, and actions to correct or remedy the failures for future D&D projects.

Project Technical Objectives - Detailed Requirements

A. Demonstrate regulatory and compliance policies and processes

1. Plan the Building 889 D&D Project to accommodate the RFCA D&D process. Develop a Proposed Action Memorandum (PAM) describing the overall project activities, as well as additional documents as necessary to support the Cleanup Workplan (CWP) D&D process requirements. Support the execution of the PAM through the regulatory review and public involvement process.
2. Assemble the D&D Standard Operating Procedures (developed based on Technical Objective B.1) into a document that can be presented and approved by the regulators and the public.
3. Prepare a written evaluation of the final versions of the CWP and the RFCA, and propose supplemental requirements which may involve changes in scope as a result of this evaluation. Additionally, include evaluation of the Building 889 activities involving a substantial threat of release, definition of potential D&D "presumptive actions", development of criteria for the extent of initial characterization, and development of criteria for the degree of DOE or regulator approval in change of procedures or application of new or different technologies.
4. Propose document outlines for the D&D PAM and any supporting documents which would not require regulator approval.
5. On completion of the Demonstration Project, prepare a revised section for the CWP describing the D&D process for future D&D projects.
6. Provide written documentation, as appropriate during the project, of actions that may be taken to streamline project requirements or increase efficiency while maintaining an acceptable degree of control.
7. Demonstrate the process for the closure of the RCRA Units applicable to Building 889 as a distinct preliminary D&D activity, and document the process to allow its use for future D&D projects.
8. Demonstrate the process for the closure of those portions of existing IAG-regulated Operable Units (OUs) as part of the D&D process. Demonstrate the process for the interface of D&D with the Industrial Area IM/IRA. Demonstrate the process for the turnover of the D&D'd site to the Industrial Area OU, including the evaluation of under-building contamination, final survey interface, and coordination of work. Demonstrate the process for coordinating the treatment of risk (accidental and residual) between the demonstration project and the Industrial Area OU, and document the reduction of risk resulting from D&D actions.
9. Demonstrate the process for complying with the Clean Air Act in both the removal of the building exhaust emission source and during building demolition, and document the coordination of this process with the Industrial Area IM/IRA.
10. Demonstrate the process for handling the safety requirements for the building to respond to either operational or D&D activity-related releases. Emphasis should be on applying a graded approach and development of justification for reduction, substitution, or elimination of requirements and development of cost-effective compensatory actions. Activities that will allow the reduction of requirements and hence cost should be identified. Approaches for streamlining documents through references or development of site-wide documentation should be identified.

11. Demonstrate the process for the implementation of OSHA requirements within the D&D process.
12. Demonstrate the process for the implementation of TSCA requirements within the D&D process, including the development and testing of asbestos and PCB characterization and cleanup methods.
13. Demonstrate the process for complying with the requirements of CERFA and DOE and GSA real property management regulations.
14. Demonstrate the process for dispositioning and/or disposing of equipment and material generated by the demonstration project. Identify operations that can be improved through modification to regulatory or compliance approaches.

B. Develop, test, and revise as necessary specific procedures

1. Develop a list of procedures required to conduct the D&D of Building 889; i.e. procedures required to be developed, Rocky Flats D&D procedures that can be modified to better accommodate D&D, and Rocky Flats D&D procedures that can be used as is. Approved procedures that have been completed, used, and revised are a project deliverable. This list shall include but not be limited to: decontamination; waste determination (radiological, hazardous, and mixed), handling, and certification; equipment disposition; facility operations (surveillance, monitoring); operational and final characterization surveys; asbestos and PCB characterization and removal;
2. Define the training requirements for D&D activities, including any unique training requirements and any modifications to the standard Site training required for D&D.
3. Develop procedures necessary to implement the graded safety approach, both for worker safety and for risk assessment/mitigation, as developed under Objective A.10 above)

C. Develop data to be used in planning the remainder of the D&D program

1. Record technical, operating, cost, and efficiency parameters for design and D&D Operations activities to be used as the baseline technology and methods for D&D planning. This will include planned and actual activity costs and durations, workforce/ resource mix, task efficiency and downtime information, support requirements (logistics, staging areas, transport, other resources), etc. Planning documentation will describe what and how data will be collected.
2. Document the change in the activities and costs of facility operation and S&M over time (separate from the D&D tasks), and the rationale for cost reductions in this category. Highlight options for building operational savings.
3. Document interior and external surveys, ambient, and effluent monitoring.
4. Provide a "platform" for separately-funded technology development activities. Provide information on technical needs and coordination support to these projects or for D&D Program trade-off studies. (Note: Activities funded under this project will utilize projected "baseline" technology; development of innovative technology will be funded from other programs.)
5. Document impacts from changes in policy and from other site programs on this project.
6. Document the decontamination results achieved (decon factors) for baseline equipment and concrete decontamination techniques and surface condition. Document the extent of efficient decontamination efforts (point of diminishing returns).

7. Document equipment and material disposition options employed, including reuse, recycle, and waste disposal.

8. Document waste disposal information such as volumes generated by type, form, and classification; fractions of material free released and cost/benefit of release; waste storage and disposal costs, requirements, and issues; ability to handle bulk liquid wastes; and waste minimization successes. Planning documentation will describe what and how data will be collected.

D. Identify acceptable conditional and unconditional release criteria

For overall D&D, cleanup/ release standards will be required for interim reuse (perhaps depending on use), for final release of an intact building, and for prior to demolition and post-demolition conditions.

1. Define and develop the pre- and post-demolition facility cleanup/release standards for Building 889, and assist in achieving regulator and DOE approval. Identify differences in standards requirements based on differences in end-state.

2. Identify ARARs, determine and interpret statutory, regulatory, and agreement-derived requirements, and evaluate risk management approaches and their impact on project schedules and activities.

3. Determine the characterization approaches that will be required to achieve the appropriate standards, including methods, instruments, QA, verification, data quality, and interaction between the cleanup activities and surveys and the final characterization.

E. Establish management systems and organizations

1. Develop an acceptable Contractor Summary Work Breakdown Structure (WBS), WBS Dictionary, Cost Estimate including estimate bases, and CPM Schedule based on the Project Summary WBS provided. This project management information will be baselined upon AMER approval and used for control of the project.

2. Organize activities (defined under the WBS) to support the separate collection of cost data, the separation of organizational responsibilities, and the definition of interfaces between the building surveillance and maintenance (S&M) and the D&D cleanup task activities.

3. Define the interfaces with and the impacts from the following ongoing site activities: IAG Remedial Actions, Accelerated Cleanup activities, Waste management (handling, storage, disposal, and treatment), Economic Development projects, and Security restructuring.

4. Develop the process for implementing the following actions at the contractor level:

a) The contractor process for declaring Building 889 surplus, and including documentation of the action so that this process may be applied for future buildings.

b) The facility disposition process to document the decision to conditionally release ("safe store"), free release, or demolish Building 889. This process will be the basis for future disposition decisions for surplus facilities.

c) The transition of ownership responsibility for the facility between contractor organizations and the support for the transfer of responsibility between DOE Offices. This includes the definition of liabilities and S&M costs.

5. Develop and document a project organization which provides clear lines of authority and responsibility within the Building 889 Demonstration project. The organization should emphasize single point accountability, clear definition of matrixed organization (or matrixed position) responsibilities, and a projectized structure to the maximum extent practical. Potential DOE and regulator responsibilities should be suggested.

6. Develop the documentation requirements to support the decontamination of facility areas and the demolition of facilities. This will include design activities, QA program requirements, and configuration control requirements, if any.

F. Lessons Learned

1. Submit final report with lessons learned, analysis of problems, recommended or potential improvements, and plans to correct for future projects. Improved contracting approaches, changes in planning methods that would improve execution, better categorization of tasks, and more flexible budget structure would be areas that could be addressed.

Date 11/14/94
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From: Tim Hornbeck
SUBJECT: RECEIPT INSPECTION OF THE FOLLOWING RECORD: RT - _____

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