

CORRES. CONTROL

OUTGOING LTR. NO.

DOE ORDER # 700.1

05 RF 00426

DIST. LTR ENC

DIETER, T.J.		
FERRERA, D.W.	X	
LINDSAY, D.C.		
LONG, J.		
LYLE, J.L.		
MARTINEZ, L.A.		
PIZZUTO, V.M.		
SHELTON, D.C.		
SPEARS, M.S.		
TUOR, N.R.		

May 2, 2005

05-RF-00426



BEAN, C.		
DECK, C.		
FOSS, D.		
FRANCIS, M.		
FREIBOTH, C.		
GEIS, A.		
GIBBS, F.	X	
HUMSTON, T.		
KNAPP, S.		
LAVORATO, K.		
LINSIBIGLER, H.		
MYERS, K.		
NESTA, S.	X	X
NORTH, K.		
OMAN, K.		
PLAPPERT, R.		
PRIMROSE, A.		
RICHARDELLA, R.		
SNYDER, D.P.		
SWARTZ, J.M.	X	X
WARD, D.A.		
WIEMELT, K.		
SILLS, S.		
SHULER, K.		

Gary Morgan, Functional Lead
Cadre Project Management Division
DOE, RFPO

RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR BUILDING 440 COMPONENT REMOVAL, SIZE
REDUCTION, AND DECONTAMINATION - DWF-031-05

Attached is a draft transmittal letter to the Colorado Department of Public Health and
Environment for the RSOP notification for Building 440 component removal, size reduction and
decontamination. The draft transmittal letter has been prepared from DOE RFCA coordinator
to CDPHE RFCA coordinator.

Please contact Steve Nesta x6386 with questions or concerns.

Dennis W. Ferrera

Dennis W. Ferrera
Vice President and Project Manager
Remediation, Industrial D&D, and Site Services
Kaiser-Hill Company, LLC

CORRES. CONTROL	X	X
ADMIN RECRD/T130G	X	X
TRAFFIC		
PATS/130		

Attachment:
As Stated

CLASSIFICATION:

UCNI	
UNCLASSIFIED	<input checked="" type="checkbox"/>
CONFIDENTIAL	
SECRET	

KLM:pvt

Org. and 1 cc - Joseph A. Legare

AUTHORIZED CLASSIFIER

SIGNATURE: *[Signature]*
Date: 5/9/05

IN REPLY TO RFP/CC NO.:

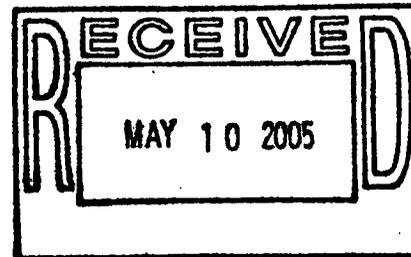
ACTION ITEM STATUS:

PARTIAL/OPEN
 CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:

SMN:pvt



ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCN

By: *[Signature]*

Date: 5/9/05

RF-46498(Rev. 9/94)

1/10

Steven H. Gunderson
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

**RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR BUILDING 440 COMPONENT REMOVAL, SIZE
REDUCTION, AND DECONTAMINATION**

Mr. Gunderson:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its attachments is notification for RSOP implementation. This notification is for all activities required to bring Building 440 to the unrestricted release criteria with the exception of RCRA unit closure. This will involve component removal, size reduction and decontamination activities utilizing the methods specified in the RSOP.

Open/active RCRA units associated with this facility will be closed in accordance with the previously submitted Closure Description Document (05-RF-00149, 3/3/05, approved by CDPHE on 3/29/05). Once the pre-demolition survey is complete and the facility meets the unrestricted release criteria, an additional notification letter will be prepared to implement the RSOP for Facility Disposition.

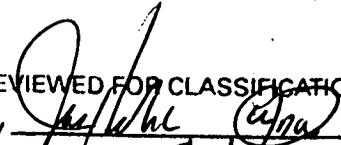
Kaiser-Hill or a subcontractor will conduct this work. If Kaiser-Hill or the subcontractor would like to use a method or process not included in the RSOP then they are required to notify and, in consultation with DOE/LRA, the RFCA process for decision document modification will be used.

The appropriate checklists and information required by the RSOP are attached to this letter and should provide the necessary information. This work will be conducted in accordance with the work control documentation prepared by Kaiser-Hill or the subcontractor. The exact methods and process selected by Kaiser-Hill or the subcontractor and progress of the activities will be communicated to DOE/LRA through the consultative process, particularly the monthly RISS production meetings. The facility will not be breached during the activity.

As indicated in the RSOP, the LRA has 14 days to review the RSOP notification letter and provide feedback, including a definitive reason for not proceeding with the project. If no feedback is received within 14 days, the project will proceed as planned.

If you have any questions regarding this, please contact me at (303) 966-2133.

Joseph A. Legare
U.S. Department of Energy

REVIEWED FOR CLASSIFICATION/UCNI
By 
Date 5/9/05

**FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITY CHECKLIST**

Building: 440
Closure Project Manager: JM Swartz

COMPONENT REMOVAL/SIZE REDUCTION

Component Type	✓
Gloveboxes	✓
Tanks and ancillary equipment (located both inside and outside the facility)	
Fume hoods	✓
Ventilation/filtration systems (both inside and outside the facility)	✓
Utilities and other equipment (both inside and outside the facility; including electrical, steam, and fire suppression systems)	✓
Walls	
Floors	
Ceilings	
Roofs	
Other structural members	
Other*	

Removal/Size Reduction Technique	✓
Small tools	✓
Paving breaker, jackhammer and/or similar tools used to break up concrete	
Excavators, such as backhoes, to excavate underground components, such as tanks and ancillary equipment	
Hoists and cranes	
Plasma arc cutter	
Diamond wire saw	
Wachs cutter	
Laser cutter	
Oxy-torch cutter	
Hydraulic shears	
Shear baler	
Water cutter using abrasives	
Arc air slice	
Arbor press	
Non-explosive cracking agent	
Other *	

* Describe "Other" Component Type(s) and/or Removal/Size Reduction Technique(s):

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Are there deviations/exceptions to the RSOP for the proposed activity(ies)?											Yes	
											X	No
Provide an explanation of deviation/exception to the RSOP: Not applicable												
C. Check the appropriate resulting action box below												
Additional RFCA decision document required (PAM – IM/IRA)												
Major modification to RSOP						Field change to RSOP						
Minor modification to RSOP						LRA consultation						
Activity(ies) will result in the following waste types										Process waste		
										X	Remediation waste	
<input type="checkbox"/>	TRU	<input checked="" type="checkbox"/>	LLW	<input type="checkbox"/>	LLMW	<input type="checkbox"/>	Haz.	<input type="checkbox"/>	Sanitary	<input type="checkbox"/>	Other: recyclable/re-use	
LRA Notification Review Time				X	14 days, no RCRA unit closure involved							
					30 days, RCRA unit closure involved							

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Project scope: Building 440 component removal, size reduction, and decontamination			
Facility description: TRU Waste Packaging and Transport Facility			
Description of planned activity(ies): The decontamination, size reduction, and component removal required to bring Building 440 to the unrestricted release criteria.			
Facility/rooms/sets/areas involved: All			
Is RCRA unit closure(s) part of the planned activity? If RCRA units are included, attach unit specific information sheets and drawings <i>*RCRA unit closure will be addressed under a separate notification letter</i>			Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/>
Attach checklists from Appendix A of the RSOP. <i>Complete checklists by room/set/area/facility, as appropriate</i>		<input checked="" type="checkbox"/>	Component Removal/Size Reduction
		<input checked="" type="checkbox"/>	Decontamination
RLCR Status		RLCR complete and concurrence received: N/A	
		RLCR initiated but incomplete; concurrence anticipated: N/A	
	<input checked="" type="checkbox"/>	RLC has not been initiated ¹ and is scheduled for initiation on: See attached Contact Record	
If RLCR is not complete or initiated, what data will be used to plan the work activities?		See attached Contact Record	
Activity requires modification to the ARARs listed in the RSOP.			Yes, <i>attach to letter</i> <input type="checkbox"/> No <input checked="" type="checkbox"/>
Attach Administrative Record file requirements for the activity. Attached			
Point of contact for each facility/activity: JM Swartz 303-435-6089			
Duration of work activities: 4 weeks		Anticipated work start: May 15, 2005	
Attach schedule for each facility or activity for information purposes. Attached			
Does the activity involve removing contaminated portions of the building shell? <i>Include a description of the activity, contamination levels and controls</i>			Yes, <i>LRA consultation and concurrence required</i> <input type="checkbox"/>
			No <input checked="" type="checkbox"/>

¹ Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

**FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITY CHECKLIST**

DECONTAMINATION

Component Type	✓
Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	
Fume hoods	
Ventilation/filtration systems (both inside and outside the facility)	
Utilities and other equipment (both inside and outside the facility; including electrical, steam, and fire suppression systems)	
Walls	✓
Floors	✓
Ceilings	
Roofs	
Other structural members	✓
Other*	

Decontamination Technique	✓
Wiping/scrubbing/washing with water or detergents	✓
Vacuuming	✓
Strippable Coating	
Grinding	
Scarifying	
Scabbling	
Paving breaker/chipping hammer	
Spalling	
Abrasive/grit blasting	
CO ₂ blasting	
Hydrolasing	
Strong mineral acids	
Organic or weak acids	
Additional oxidants, such as cerium and other similar metals	
Other *	

* Describe "Other" Component(s) and/or Decontamination Technique(s):

Note: In the event a planned activity falls outside the scope of this RSOP, the closure project manager will consult with DOE and the LRA to determine whether this RSOP should be modified to include the activity, or whether a separate decision document should be written.

Prepared by: Kimberly L. Myers

Date: April 28, 2005

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Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities

Activity ID	Activity Description	% Comp	Orig Dur	Rem Dur	Current Early Start	Current Early Finish	Total Float	FY05																			
								APR				MAY				JUN				JUL				AUG			
								4	11	18	25	2	9	16	23	30	6	13	20	27	4	11	18	25	1	8	
440 - Vehicle Modification Center																											
1FD440127	B440 Glovebox Removal	0	16	16	16MAY05*	13JUN05	64																				
1FD440120	B440 Elec/Pwr Utility Iso Strip Haz Waste	0	4	4	07JUN05	13JUN05	64																				
1FD440125	B440 ACM Abatement	0	8	8	14JUN05	27JUN05	64																				
1FD440130	B440 Telecom/Alarms Isolations	0	4	4	22JUN05	28JUN05	64																				
1FD440110	B440 Mech Utility Isolations	0	2	2	23JUN05	27JUN05	64																				

Start Date 01FEB99
 Finish Date 21FEB06
 Data Date 25APR05
 Run Date 28APR05 09:26

PODC
 RISS POD
 B440 Component Removal

Sheet 1 of 1

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 4/28/05 – 0800

Site Contact(s): Duane Parsons (RISS) – (DAP-031)
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 440 RLC & Repack Glovebox System

Meeting Attendance

D. Kruchek, CDPHE D. Parsons, K-H M. Swartz, K-H

Discussion

As part of the 440 Project Demolition Project, the Repack Glovebox System needs to be stripped out of the building and properly dispositioned prior to building demolition. This Repack Glovebox System consists of a glovebox, exhaust ducting, an exhaust HEPA plenum, and a C-Cell. Since this building has been full of radioactive waste until just recently, a Reconnaissance Level Characterization (RLC) has not been able to be performed to date. However, due to the presence of the Repack Glovebox System, it is anticipated that the building would be a RFCA Type 2 facility had an RLC been performed. Performing an RLC at this point in time would provide little value for what remaining work needs to be performed inside the building in order for building demolition to take place. Other than the Repack Glovebox System, all other potential hazards of the building are low. Holdup measurements of the Repack Glovebox System have been performed and the levels of potential holdup are well within the range of a RFCA Type 2 Facility (i.e., less than 3.9 grams of plutonium and 0.03 grams of americium holdup in the Repack Glovebox System, which is well below Special Nuclear Material Safeguards Program requirement threshold levels).

On April 27, 2005, Mike Swartz discussed the above information with David Kruchek (CDPHE). It was decided that Building 440 would be considered to be a Type 2 Facility, and that an RLC will not need to be performed for Building 440. It was also agreed that the 440 stripout work and demolition could be performed under the appropriate RFCA RSOP's. The appropriate RSOP notifications will be submitted prior to the start of physical work. The Repack Glovebox System stripout work package, Radiological Work Permit, Auditable Safety Analysis, and the Holdup Measurement data will be submitted to CDPHE for review prior the start of Repack Glovebox System stripout work. After the Repack Glovebox System stripout work is completed, and after any other necessary stripout work is completed in other portions of the building, a comprehensive Pre-Demolition Survey of the building will be performed and a PDSR will be submitted to DOE and CDPHE for review and approval prior to building demolition.

Contact Record Prepared By: D. Parsons

Required Distribution:

J. Legare, DOE
C. Deck, K-H
D. Shelton, K-H
C. Gilbreath, K-H
S. Gunderson, CDPHE
L. Kilpatrick, K-H

R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
G. Morgan, DOE
T. Rehder, USEPA

Additional Distribution:

M. Swartz, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Roberts, DOE

10/10