

Building Decommissioning Regulatory Process

Step 1 Deactivation/End of Mission Turnover Report

Required for all Type 1 and 2 buildings once their missions have ended. Additionally, Type 3 buildings excluding activities for the purpose of SNM accountability and nuclear safety. The DPP should also include a list of each building's current mission and schedule for ending that mission.

Step 2 Decommissioning Scoping Phase with the Regulators

To discuss building specific conditions and procedures for eventual decommissioning.

Step 3 Reconnaissance Level Characterization

The characterization will include, at a minimum, an initial safety analysis for the building(s), summary of building condition, preliminary hazard assessment, radiological and chemical contamination identification and characterization, and classification of each room/area per agreed upon method(s) possibly MARSIMs or other procedures.

Step 4 Submit Reconnaissance Level Characterization Report

RLCR summarizes the results of information developed. Provides an analysis of the results and summarizes the hazards and risks associated with them. Recommends DOE's building classification and provides adequate detail so that the LRA can make a determination as to the classification of the facility. To be submitted to the LRA at least fourteen (14) calendar days prior to building classification decision.

Step 5 Building Classification Decision

LRA determines appropriate building classification, subject to dispute if necessary. Once the classification is determined, each building will require the following regulatory involvement:

<u>Type 1 Buildings</u>	<u>Type 2 Buildings</u>	<u>Type 3 Buildings</u>
No additional regulatory involvement required?	Decision Document required PAM, IM/TRA, etc	DOP

*No further regulatory involvement for Type 1 buildings provided an approved SOP for Asbestos abatement and/or PCB removal is utilized where necessary.

Step 6 Develop Project Execution Plans

See Attachment I for required information to be included in the PEPs. Regulatory involvement with the PEPs will occur as follows:

<u>Type 1 Buildings</u>	<u>Type 2 Buildings</u>	<u>Type 3 Buildings</u>
Made available to regulators upon request.	Submitted for LRA approval as the decision document or as an attachment to the decision document	Submitted for LRA approval as the DOP or as an attachment to the DOP

Step 7 LRA Approval/Modification/Disapproval of PEP/Decision Documents/DOP

Following required public comment period

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ADMIN RECCRD

SW-SW-A-003203

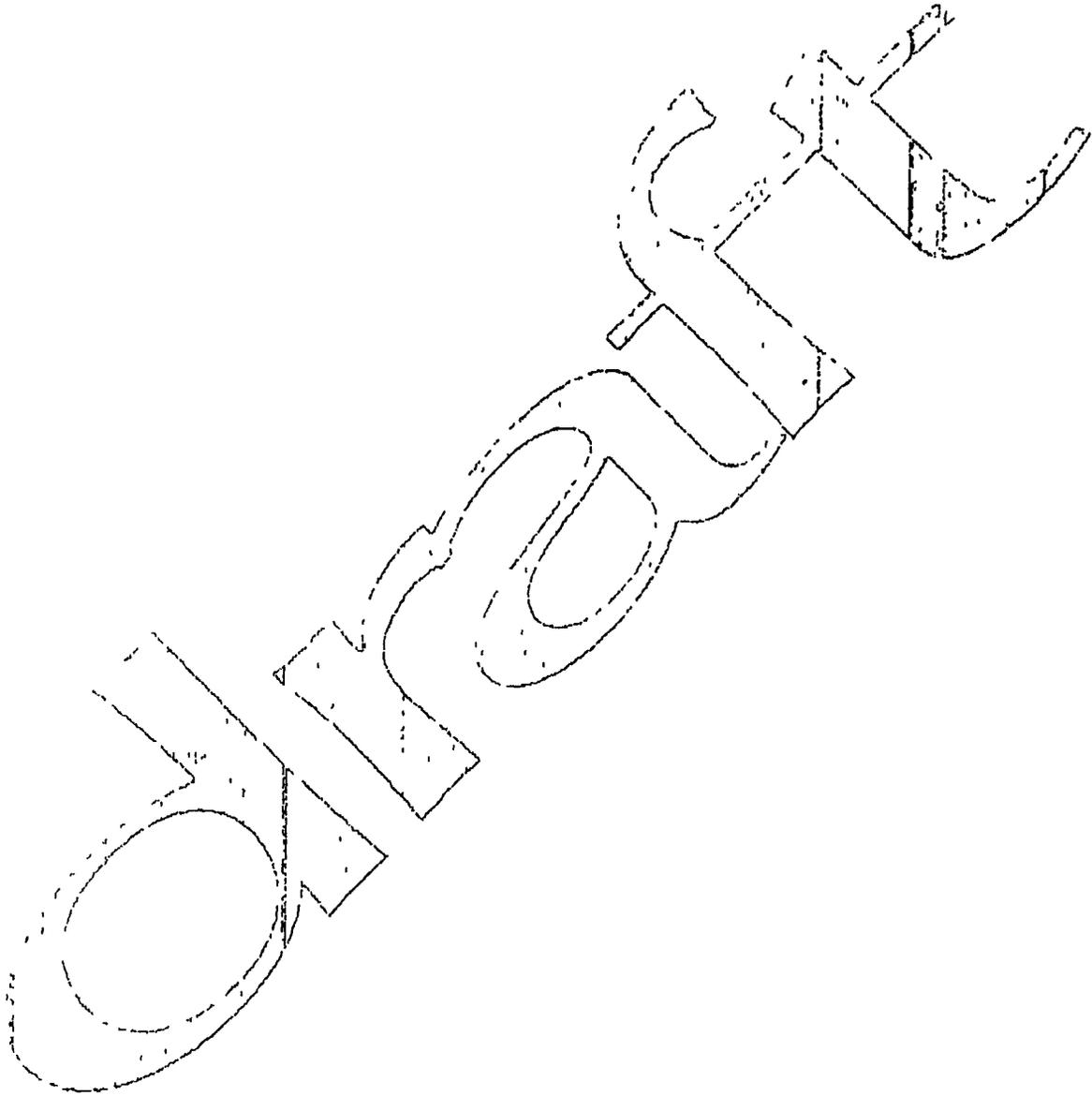
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Step 8 Implementation

During implementation, weekly status meetings with the regulators including frequent oversight inspections

Step 9 Close-Out

Transfer to Environmental Restoration per RFCA 118, including characterization data necessary for IHSS ranking



Attachment 1 - Project Execution Plans

The individual facility project execution plan (PEP) includes all aspects of the project necessary for project management and implementation. The PEP shall be submitted to the LRA for approval as part of the decision document (e.g., PAM, IM/IRA or DOP) or as an attachment to the decision document. The PEPs will include the elements listed below as necessary:

- Project Justification - Specifically why project completion is needed at this time
- Project Description
- Relationship of decommissioning effort to long-term remedial action objectives
- Brief history of the facility
- Identification of type, magnitude and location of contamination to be removed
- Identification of RCRA units to be closed
- Summary of project activities
- Orders, regulations and laws
- Applicable environmental regulations - NEPA
- Facility disposition
- Building cleanup criteria and how the criteria is applied
- Related action levels
- Waste disposal criteria
- Air and NPDES permits and monitoring requirements
- Property disposition
- Project Team - Preferably an organization matrix which delineates responsibility throughout the project including qualifications and training requirements
- Environmental Management/Compliance
 - Specifically mention the Federal and State approvals needed for the project
- Any RSOP planned to be used in the execution of the project
- Hazard Assessment Summary
- Safety Analysis Summary
- Health and Safety requirements - Demonstration of appropriate health and safety provisions based on the RCRA hazard assessment and safety analysis
- Decontamination Plan - To include methods to be used for decontamination and sampling and analysis requirements. In addition, decision logic for determining amount of decontamination (e.g., how much effort should be utilized to decontaminate a TRU waste to a LLW, or mixed to non-mixed, etc.)
- RCRA Unit Closure Description Document - Specific plans for permitted or interim status RCRA units will be contained in a closure description document. The purpose of the closure description document will be to identify the method or methods to be employed, and the rationale for choosing those methods for the specific closure activity. The Closure Description Document will also define the extent of the unit or units, the type of closure to be performed (either partial or complete), the type of contamination to be addressed, decontamination method to be conducted, decontamination media to be used, the schedule for accomplishing the closure, and other applicable information associated with the unit closure activities
- Waste Management information - to include, at a minimum, the amount of waste to be generated, the disposition of the waste and the process for characterization of the waste
- Quality Management Requirements - A description of how quality is verified and maintained including ongoing oversight activities and training requirements
- Demolition Plan and Survey - The process for demolition of the building/facility must be addressed and described in the document including necessary monitoring requirements

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- Technical Sequencing Requirements - A flow chart which identifies the sequence of decommissioning activities throughout the process
- Schedule - A schedule must be included, which includes definite dates and activity logic
- Spill/Release Controls - To identify the monitoring requirements for detection of releases and/or spills and how they will be controlled
- Risk Management Contingencies - An analysis of possible unexpected problems and their effect on the project must be included, along with potential contingencies to reduce effects of unexpected problems
- Regulatory Process for Unexpected Issues - During the D&D process, the discovery of additional contamination (either type and/or amount) not previously described in the Reconnaissance Level Characterization Report may precipitate the reclassification of the building (e.g. a Type 1 building may be reclassified as Type 2). Any such reclassification will be conducted jointly by DOE and the LRA, and may require that a RFCA decision document be generated to cover the D&D of the building. In general, the discovery of radiologic contamination above free-release limits in a Type 1 building would cause the building to be reclassified as a Type 2 building. It is not expected that newly found contamination in Type 1 or Type 2 buildings would cause them to be reclassified as Type 3 buildings

The discovery of unanticipated contamination may also require that modifications be made to existing RFCA decision documents pertaining to Type 2 and Type 3 buildings. Major and minor modifications to PAMs or IMIRAs will require the approval of the LRA within the time frames discussed in paragraphs 126 and 127, respectively, of RFCA.

If a RFCA Project Coordinator determines that newly discovered conditions necessitate a field modification to work be made immediately to avoid either an imminent threat to human health, safety of the environment, or undue and unnecessary delay, such modification will be made pursuant to paragraph 130 of RFCA.

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