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Subject DPP Rewrite

In response to your suggestions, How about these alternate words for the DPP?

Let me know what any of you think of these

### 3.4.5 Type 1 Building Decommissioning

Decommissioning of buildings classified as type 1 (uncontaminated) based on an approved reconnaissance level characterization report will not require RFCA decision documents and will proceed based on standard plant operating procedures

However if contamination is discovered, during decommissioning of a building classified as Type 1, decommissioning activities will cease until the LRA is notified and the need to reclassify the facility is considered collaboratively

Discovery of minor spots of contamination will not necessarily result in the need to reclassify a building upwards into the Type 2 classification. If minor contamination can be removed by methods in which there is no possibility of dispersion or release to the indoor or outdoor environment, for example by simply cutting out a section of a panel holding a spot of fixed contaminant, the building may remain as type 1. Minor contamination in type 1 buildings will be removed by standard methods described in a SOP submitted to the LRA.

Reclassification into the type 2 category must be considered in any instance where removal techniques involve a "threat of release". These would include operations which disrupt materials in such a manner as to result in airborne or waterborne concentrations of contaminants.

[ I looked at different criteria for providing guidance for what could be considered "minor contamination" concentration values, quantity values, DAC levels, but couldn't find anything I could justify as "minor". Unfortunately, real-world regs don't list an exempt quantity for plutonium as they do for most other radionuclides ]

### For the mothballing issue

Add to sec 3 4 4, on RLCR

The RLCR will be submitted to the LRA prior to removing any building from service or beginning decommissioning. Should DOE/KH choose to "mothball" a facility for a period prior to inception of decommissioning, DOE/KH will prepare a hazards analysis of the facility specific to the mothballed period, meet with the LRA to discuss any potential hazards or releases to the environment which might occur during the mothball period, devise mitigative actions for potential releases in collaboration with the LRA and propose adequate monitoring methods to assure the absence of any release.