RFFO

DECOMMISSIONING PROGRAM PLAN (DPP) STATUS

APRIL 20, 1998

Parts used by Rampe to brief CAB

REVIEWED FOR CLASSIFICATION/UCNI
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Date 4-20-98

Rocky Flats Field Office

ADMIN RECORD
SW-A-003224
AR-99-000015

DPP status

- DPP is required by RFCA
- Requires public comment period and formal approval by EPA and CDPHE
- Sent out for public comment and approval by EPA and CDPHE starting 4/17/98

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DPP SCHEDULE

ACTION	DATE
Start public comment period - Public involvement activities	April 17, 1998
End 60-day public comment period	June 17, 1998
Incorporate comments and submit to EPA and CDPHE for approval (<30 days)	July 17, 1998
EPA and CDPHE review/approve or disapprove (<14 days)	July 31, 1998
DOE incorporates final comments and issues approved DPP*	August 7, 1998

* If DOE and the regulatory agencies cannot agree on the final version, they may begin a dispute resolution period at this time

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DPP status

- Regulatory steps for decommissioning
- DPP answers: When is a RFCA decision document needed?
- Three building types
  - Type 1 -- Buildings free of contamination
  - Type 2 -- Buildings without significant contamination or hazards, but in need of decontamination.
  - Type 3 -- Buildings with significant contamination and/or hazards, e.g., 771, 776, 779

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- Reconnaissance Level Characterization Report for all buildings
  - Used for classification (typing)
  - Send to LRA for concurrence
- Type 1 (non-contaminated) D&D requires sending a notification letter to CDPHE

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- Use RFCA decision documents (IM/IRAs, PAMs, DOPs) for getting regulator approval for Type 2 and 3 buildings
- Future use of RFCA Standard Operating Protocols (RSOPs) is TBD

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Recent "major" changes

- Changed end points for deactivation from specific to examples
- Surveys may be needed for Type 1 buildings
- Definitions of Type 2 and 3 buildings
- Resolution of safety and health hazards occur outside RFCA framework
- Readiness evaluations may be staged

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Recent "major" changes (cont.)

- Support buildings may be included in a DOP.
- Site's decommissioning characterization protocols will be used for surveys
- LRA has concurrence role for the notification letters for Type 1 buildings.
- Clarifies when documentation is needed if an activity appears to need a RFCA decision document.

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Open discussion points

- Recording all determinations made about when a RFCA decision document is needed
- Notification of regulator if "assumptions or scope" vs. scope only changes for projects proceeding w/o RFCA decision document
- End of mission declaration
- Definition and management of "remediation waste" -- probably handle outside of DPP.
- Table of contents for DOP

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- FDMP
  - Plant procedure
  - Internal (RFETS) review and approval
  - More detailed than DPP
  - Includes overall building disposition process (deactivation and decommissioning)
  - Emphasis on "how to" at project level