

Unofficial from
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3/2/98

DPP Comments
2/13/98 Version

CDPHE has become frustrated with the DPP review process, largely due to the selective acceptance of comments responded to, the lack of progress on fundamental issues rather than wording, and the continued lack of consultation on ongoing projects. In order to shift the focus of discussions from arguing over what a given set of words mean, CDPHE proposes that we look at the fundamental issues that flavor our reactions to the wording.

Major D&D issues.

1 Continued distrust of DOE document manipulation continues to fog review and discussion of DPP issues. It appears to us that DOE has attempted in DPP revisions to rewrite RFCA agreements regarding the building disposition process.

2 Difference in view of regulatory process. DOE proposes regulatory process confined to approval of formal decision documents. CDPHE considers the approval of formal decision documents to be a component of an effective oversight program that begins before regulatory authority exists and continues until all activities are completed. Thus DOE argues over when the regulators have to receive a document; CDPHE expects to have had significant input in the conceptualization of the work activity, creation of the work logic, and drafting of the documents

Compounding this different view, DOE and KH have fulfilled the consultative process on only one D&D project. Major consultative failures exist for every other D&D project underway or being planned. See item 1

3 Based on the difference in view described above, and the level of distrust, subtle nuances of wording take on sinister appearances, probably beyond all intent. For example, DOE asserts that we have agreed to criteria for when decision documents are required. On its face, this statement is correct, but when viewed through a veil of distrust, this sounds like a limitation of regulator involvement to review of a completed document far down the planning process. While we have agreed to these criteria, we have not done so absent agreement on other related decisions/actions that are as yet unresolved

4 What is the difference, per RFCA, between deactivation and decommissioning? (Noting yet again that many definitions abound for each of these terms)

Recognizing that the activities covered by deactivation and decommissioning are largely identical, with specific exceptions

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(non-fixed equipment, etc), we believe that RFCA clearly organizes decommissioning authority as follows

a) Buildings with ongoing SNM activities - In as much as regulated by DNFSB, are not in decommissioning, and may have deactivation activities Areas of the building not involved in SNM activities are in decommissioning, subject to the scoping and initiation of activities

B) Buildings that do not have SNM activities ongoing - currently in decommissioning arena, pending scoping and initiation of closure activities No deactivation for these buildings, as they are not regulated by DNFSB or AEA authorities

We recognize that many buildings have ongoing operations that prevent initiation of decommissioning or deactivation Scoping of the operating life of the building, and planning for the transition into active deactivation or decommissioning as appropriate, will go a long way towards eliminating confusion over the regulatory status of these buildings, and increase our comfort level with DOE's commitment to the consultative process

We also believe the process for determining the appropriate level of regulator oversight (characterization - typing approval, scoping, decision document approval) provides a simple, straightforward approach to getting over authority questions, and provides the Site the comfort they seek in clarifying requirements Hopefully, once we get the consultative process back on track, with regulator involvement beginning with deactivation scoping, disagreements in this arena will disappear

5 Lack of planning continues to be a problem As noted above, we believe that our increased involvement in scoping and planning will help avoid the problems we continue to have with last minute decisionmaking, but ask that DOE take a more proactive role in managing contractor activities If the DOE representative on a project cannot represent to us the value and need for some recently conceived activity not included in the year's work scope, we are placed in the position of performing DOE's management role From this week's discussions over the B771 Line 30 project, I can assure you that we find this as unpleasant as you do

DPP Problem Areas

- A Deactivation versus decommissioning
- B Building typing authority
- C Regualtor role in scoping
- D Process revision from RSOP's to decision documents
- E Purpose of DPP

E Purpose of DPP

As envisioned in RFCA, the DPP was a companion document to the Deactivation Program Plan, that described detailed decision making criteria and how RSOP's would be applied. It would codify the general procedures to be used for decommissioning activities DOE proposed in November that the Building Disposition process agreed to in RFCA be changed to a general process document and that procedures and RSOP development be delayed. The most recent Draft DPP calls for the DPP to establish "the regulatory steps to be used for decommissioning contaminated buildings"

This narrow view of the DPP creates a tension around the regulators need to understand the entire building disposition process and brings emphasis to the differing view of the regulator role, described in item 2 above

I propose an official, jointly approved decision timeline, encompassing the entire building disposition process. I believe this was drafted for the original DPP, and may now reside in the FDMP. This would help resolve regulator concerns about being excluded from the planning process and provide guidance to DOE and contractor staff regarding the consultative interactions expected

CDPHE Building Oversight Project Team at RFETS 2/27/98

<u>Team Members</u>	<u>Role</u>
Joe Schieffelin	co-Team Leader
Steve Tarlton	co-Team Leader
Chris Gilbreath	D&D Project Manager, Residues technical lead
Edd Kray	D&D Project Manager, Radiation technical lead
Cindy Burbach	D&D Project Manager, RCRA compliance technical lead
Ed Smith	D&D Project Manager, Waste inventories/mgmt technical lead
James Hindman	D&D Project Manager, RCRA closure technical lead

Project Assignments

D&D Project	Project Manager
DPP completion	Kray/Gilbreath
B779 decommissioning	Kray
B123 decommissioning/demolition	Gilbreath
B886 deactivation	Kray
B886 decom scoping and planning	Kray
B886 decommissioning	Kray
B771/774 deactivation	Gilbreath
B771/774 decom scoping and plng	Gilbreath
B771/774 decommissioning	Gilbreath
B776/777 deactivation	Burbach
B776/777 decom scoping and plng	Burbach
B776/777 decommissioning	Burbach
B881 deactivation	Hindman
B881 decom scoping and planning	Hindman
B881 decommissioning	Hindman
B444 deactivation/shutdown	Burbach
B707 deactivation	Smith
B707 decom scoping and planning	Kray
B707 decommissioning	Kray
B371/374 deactivation	Gilbreath
B371/374 decom scoping and plng	Gilbreath
B371/374 decommissioning	Gilbreath

R&D Project	Project Manager
PA 500 Area	Burbach
PA 900 Area	Kray
non-PA 400/800 Area	Smith
non-PA 500/600/900 Area	Smith
non-PA 100/200/300 Area	Hindman