



Rocky Flats Citizens Advisory Board

A Vision for the Cleanup of Rocky Flats

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The Process

Following is an outline of the discussions that took place at each monthly work session or study session throughout the development of the Board's "Vision."

October 1998

The first topic the Board decided to discuss is how each Board member viewed the concept of "cleanup" and "closure," and more specifically their definitions of those terms. DOE-Rocky Flats representatives gave a presentation to the Board on the site's perspective — what the Closure Project means to them — including the assumptions made in planning for the closure of Rocky Flats. The initial discussion simply allowed the Board members a chance to air their views, an opportunity for each to see what the varying points of view would be. Some of the themes from the first discussion included:

- Ultimately the cleanup should be done to background levels.
- Interim cleanup levels should be used.
- Closure might be when DOE completes the project, but cleanup may still be necessary after that.
- Use a phased approach.

November 1998

As a follow-up to the October meetings, comments were reviewed and any areas of divergence and/or convergence on specific topics were identified. RFCAB members' opinions varied on how the terms should be used — cleanup vs. closure — since at times both terms are used interchangeably. In addition, Board members' views of what exactly needed to be accomplished by the time of closure, be it 2006 or 2010, varied significantly. However, members did seem to generally agree that DOE's end-state, as described in the closure plan, did not necessarily mean that action at the Rocky Flats site would end. RFCAB members would need to include a discussion in the future about post-closure and stewardship issues.

Next, Board members worked through their thoughts on

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specific areas involving cleanup and closure, such as environmental restoration, waste management, D&D, disposition of special nuclear materials, and stewardship. Working backward from the end-state, the Board tentatively agreed to a timeline showing the end-state as "cleanup to background levels, safe for any use, and reuse designated as open space." A second phase of cleanup — Phase B — would involve new or interim cleanup levels, ongoing cleanup, technology development and research, with a federal agency responsible for stewardship. The current phase of cleanup was left somewhat open, with more specific definitions to be provided in a future discussion.

Also in November, the Board received a general presentation on waste storage issues. This would comprise the next topic RFCAB would engage in for a few months. The presentation gave general information about the current inventory at the site, plans for the future, etc. Then Board members began an open discussion about waste. Ideas and comments generated:

- Should there be new buildings for waste storage, whether permanent or temporary? What about the possibility of using buildings already in place?
- What about building foundations, rubble, and process lines that need to be removed?
- Does RFCAB support the shipment of waste offsite? And if so, where to?
- Closure will not be possible if the waste remains onsite.

December 1998

The Board agreed by consensus on a revised timeline for phases of cleanup at the site, as originally agreed to at its November meetings:

Phase A: cleanup to regulatory levels
Phase B: cleanup to background levels

Next, as a follow-up to its initial waste storage/disposition discussion, the Board launched into discussion and debate about whether or not waste from Rocky Flats should be sent to the WIPP site, as well as other issues about the long-term storage and disposition of waste. Although many Board members are in favor of shipping waste to WIPP, an equal number are opposed and have concerns about transportation, monitoring, and access to the waste after it is stored. Based on the comments and concerns raised by RFCAB members, there appeared to be two distinct areas on which the Board could agree:

- Research should continue into technologies that

would make radioactive waste less dangerous, or inert, in the future.

- Waste should be stored or disposed in a manner that poses the least risk to humans and the environment.

However, opinions varied so widely on fundamental issues surrounding the ultimate disposition of waste that the Board could not reach consensus on this issue.

January 1999

RFCAB had other projects to work on during the month of January, and did not schedule any substantial discussions on Vision topics. However, staff did present a matrix/timeline for the remainder of topics to be covered for the Vision process and a draft outline on how this Vision document might be prepared.

February 1999

This month, Board members began discussing a new topic, what to do with building rubble resulting from demolition. DOE gave a presentation to RFCAB on the site's plans. Three options were presented, with a preferred option being to fill the foundations of two buildings — 371 and 771 — with the clean rubble generated at the site. Areas of convergence that were identified so far:

- General support for the onsite disposition of clean building rubble.
- Complete characterization and remediation of under-building contamination before filling the foundations.

March 1999

To start the discussions on low level waste issues, RFCAB received a presentation from the site on its inventories of low level and low level mixed waste, as well as plans for disposition. Waste may be shipped to either the Nevada Test Site, Envirocare in Utah, and possibly Hanford. The Deer Trail facility on the eastern plains of Colorado was being considered as a site to accept waste with concentrations greater than 10 nCi/g, yet less than 100 nCi/g, or "orphan" wastes. However, this option was later removed from consideration by the company that owns the site. Board members asked for more detailed information to aid in their discussions: information about disposal criteria, regulations, long-term stewardship of the waste, surveillance and monitoring plans, transportation of the waste, contingencies, and possible alternatives.

The Board also continued working on draft comments to DOE about its position on the disposition of building rubble.

April 1999

RFCAB members discussed the process for developing its Vision, and decided to change its process for continuing the discussions a little bit — allowing a less-structured format during discussions, and using email for early discussions prior to the meetings, to help get comments out in the open.

The Board finalized a letter to be sent to DOE stating RFCAB comments on the site's plan for disposition of building rubble. As there was not clear consensus of opinions, Board members agreed simply to send a letter transmitting their comments:

- Adequate remediation of under-building contamination is required, also use adequate sampling protocols and techniques.
- Ensure no impacts from dust off the staged rubble, or impacts on surface water quality from building rubble runoff.
- Monitoring the disposition area must continue; make the rubble retrievable; include building rubble location in plans and materials.
- Consider using a Corrective Action Management Unit (CAMU) as an option.

Also in April, RFCAB continued with a follow-up discussion on low level waste issues. Members began to outline concerns about the disposition of low level mixed waste — including remediation and treatment as an alternative to disposal, defining the difference between "storage" and "disposal," maintaining the waste in a monitored and retrievable configuration; and transportation risks. Board members then agreed to discuss their ideas and concerns via email.

May 1999

Based on its email discussions held between meetings, Board members had an idea of each other's concerns and points of view about low level waste disposition. In May they worked on analyzing and developing an agreement on what is more appropriate: storage vs. disposal, onsite vs. offsite. The Board agreed to use the term "containment," then created a list of values they shared about containment of low level waste - that it be isolated, monitored, retrievable, and secure.

Next, members worked on assessing a set of low level waste storage and disposal options, but were unable to reach agreement on any of the options they had suggested. They could, however, agree on a few themes that came out of their discussions:

- The containment system should be designed for shorter periods of time, no longer than 200 years.
- A secondary containment system should also be designed in the event of failure.
- Transportation risks must be considered.

June 1999

Once again via email, Board members had the opportunity to review and comment on a draft Vision recommendation on Low Level Waste Containment prior to meeting in June. At that meeting, they worked on refining the Vision statement, by adding language that better defined each of its values — that the waste be isolated, monitored, retrievable, and secure — and adding statements about stewardship, future funding, and public involvement.

Also in June, the staff gave Board members an update on their progress toward developing the Vision, what needed to be accomplished and in what timeframe so as to complete the process, and issues that still needed to be addressed.

July 1999

Following up on an initial discussion of cleanup levels and cleanup phases, originally began in December, the Board now felt it had discussed enough of its Vision concept to again address the issue of cleanup levels. Staff prepared a list of possible options for RFCAB members to consider their view of cleanup levels during regulatory cleanup, and also for a period of time after regulatory cleanup had finished. Board members agreed on a statement that at the end of regulatory cleanup, the level should meet unrestricted use criteria and protect surface water quality. Comments were added to ensure that new cleanup technologies be analyzed and considered into the future.

Then in the study session, RFCAB received a presentation on the proposed use of closure caps at the site. After giving each member a chance to present their views on this environmental restoration option, the Board agreed in general it did not support the use of caps, unless there is no other option available.

August 1999

The Board refined its definition of background levels for radiation in soils.

September - October 1999

The Board identified some areas that needed clarification in September and officially approved the final document in

October.

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