

STATE OF COLORADO

Roy Romer, Governor
Patti Shwayder, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

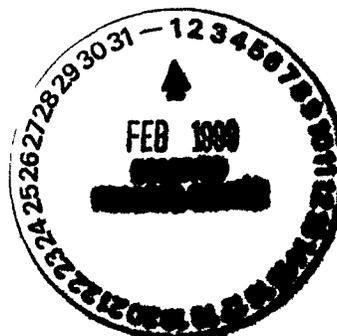
HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
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Colorado Department
of Public Health
and Environment



January 11, 1999

Mr John J Rampe
D&D Program Leader
Rocky Flats Field Office
U S Department of Energy
P O Box 928
Golden, CO 80402-0928

Mr Joseph Legare
RFCA Project Coordinator
U S Department of Energy
P O Box 928
Golden, CO 80402-0928

RE: Approval of the Building 771/774 Closure Project Decommissioning Operations Plan

Dear Mr Rampe and Mr Legare

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the Building 771/774 Closure Project Decommissioning Operations Plan (hereafter called the 771/774 DOP) dated December 7, 1998. The Division hereby approves the Building 771/774 DOP.

As identified in the Building 771/774 DOP, this document provides a general description of the steps which will be followed to decommission the Building 771/774 Cluster and states that, "the detailed technical approach to decommission an area/room of the Closure Project will be developed and approved in accordance with the Integrated Work Control Process (IWCP)." One of the more significant comments identified in our October 26, 1998 comments on the draft DOP was in regards to the level of detail in this decision document and the Division's authority with respect to work packages to be developed. Since our comments were submitted, we've had numerous meetings and discussions regarding the authority issue. Representatives from DOE, Kaiser-Hill, EPA and the Division (hereafter called the parties) have participated in these discussions along with their legal counsel. Although complete agreement was not reached by the parties as to the Division's authority as lead regulatory agency in regulating decommissioning activities at the Site, the parties did agree that the Division would exercise its oversight authority by participating in the Site's IWCP which would include reviewing draft work packages and having an opportunity to participate in the work package "round table" discussions. The parties agreed to use the IWCP as a forum for RFCA consultation. If the Division's concerns are not

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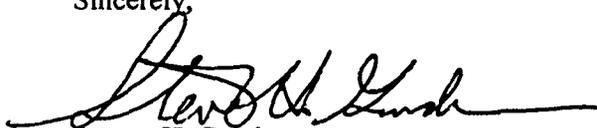
resolved through this process, and we believe that the proposed work meets the criteria for issuing a stop work order under RFCA, the Division may issue such an order

In order to facilitate a consistent and effective oversight role, the parties are currently in the process of developing guidance for integrating our oversight responsibilities with the Site's IWCP. It is our intent that this guidance act as the framework for all future development and implementation of decommissioning decision documents. As written, the Building 771/774 DOP gives a generic overview of the IWCP which is consistent with the Division's oversight role as described above, although it does not describe that role explicitly. Clearly defining our oversight role has been left largely to the consultative process established by RFCA which in the case of Building 771 will be worked at the project manager level. From our perspective the success of decommissioning the Building 771/774 cluster is heavily dependent upon the IWCP and our involvement in this process.

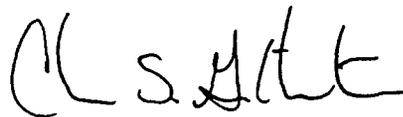
Although initial agreement was reached during our December 21, 1998 meeting regarding the Decommissioning Characterization Protocols (DCPs), the revised DCPs have not yet been submitted to the Division for concurrence. As discussed during that meeting, the parties envision oversight of the Sampling and Analysis Plans through the IWCP. Final building surveys will be submitted to the Division for review and approval prior to demolition. The Building 771/774 DOP references this document primarily in the area of final building surveys and analysis. As written, additional characterization activities occurring prior to final surveying and demolition will be governed by the IWCP requirements. If, however, the scope of the DCP's change, the Building 771/774 DOP will need to be revised as applicable.

If you have any questions regarding these comments, please contact Chris Gilbreath at (303) 692-3371

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

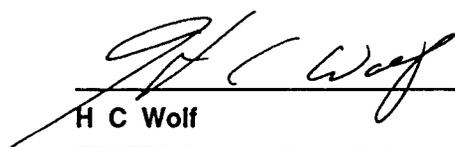


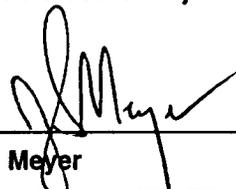
Chris S. Gilbreath
Building 771/771 Project Manager

cc D Miller, AGO
V Pizzuto, Kaiser-Hill
S Tarlton, CPDHE
T Rehder, EPA

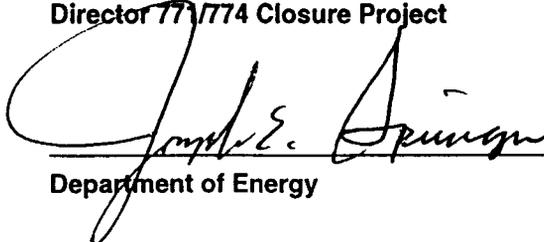
**Building 771/774 Closure Project
Decommissioning Operations Plan
Revision 0
Approvals**

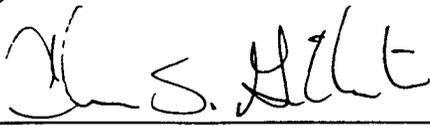
Prepared By:  12-9-98
P K Vacca Date
771/774 Closure Project

Approved By:  12/9/98
H C Wolf Date
771/774 Closure Project Manager

Reviewed By:  12/10/98
J G Meyer Date
Deputy Director 771/774 Closure Project

Approved By:  12/10/98
V M Pizzuto Date
Director 771/774 Closure Project

Approved By:  12-10-98
Department of Energy Date

Approved By:  1-11-99
CO Dept of Public Health & Environment Date