

**Robbins, Jan**

**From:** Kelly, Gerard

**Sent:** Wednesday, November 15, 2000 4:50 PM

**To:** Robbins, Jan



771 RLCR Supplement  
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Attached is a file that Dyan Foss requested I send to you. It's the RLCR for the 771 Type 1 facilities. It is not corrupted. Call me @ x4979 if you have any questions.

Gerry



ADMIN RECORD

B771-A-000117

151



# **Rocky Flats Environmental Technology Site**

## **RECONNAISSANCE LEVEL CHARACTERIZATION REPORT (RLCR) SUPPLEMENT**

### **TYPE 1 FACILITIES**

### **771 CLOSURE PROJECT**

**REVISION 0**

**November 8, 2000**

**Approved by:**

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Tom Scott, D&D Programs



ALSH RECORDS

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## ATTACHMENTS

A	SURVEY UNIT 771001 DATA
B	SURVEY UNIT 771002 DATA
C	SURVEY UNIT 771003 DATA
D	SURVEY UNIT 771004 DATA
E	SURVEY UNIT 771005 DATA

F SURVEY UNIT 771006 DATA  
G SURVEY UNIT 771007 DATA  
H SURVEY UNIT 771008 DATA  
I SURVEY UNIT 771009 DATA  
J SURVEY UNIT 771010 DATA  
K SURVEY UNIT 771011 DATA  
L SURVEY UNIT 771012 DATA  
M SURVEY UNIT 771013 DATA  
N SURVEY UNIT 771014 DATA  
O SURVEY UNIT 771015 DATA  
P SURVEY UNIT 771016 DATA  
Q SURVEY UNIT 771017 DATA  
R SURVEY UNIT 771018 DATA  
S SURVEY UNIT 771019 DATA  
T SURVEY UNIT 771020 DATA  
U SURVEY UNIT 771023 DATA  
V SURVEY UNIT 771024 DATA  
W SURVEY UNIT 771025 DATA  
X SURVEY UNIT 771026 DATA  
Y SURVEY UNIT 771027 DATA  
Z SURVEY UNIT 771030 DATA  
AA SURVEY UNIT MAPS  
AB Po-210 INVESTIGATION DATA  
AC MINIMUM DETECTABLE CONCENTRATION (MDC) CALCULATIONS

## ABBREVIATIONS/ACRONYMS

ACM	Asbestos containing material
Am	Americium
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CDPHE	Colorado Department of Public Health and the Environment
DCGL <sub>EMC</sub>	Derived Concentration Guideline Level – elevated measurement comparison
DCGL <sub>LW</sub>	Derived Concentration Guideline Level – Wilcoxon Rank Sum Test
D&D	Decontamination and Decommissioning
DDCP	Decontamination and Decommissioning Characterization Protocol
DOE	U.S. Department of Energy
DPP	Decommissioning Program Plan
DQA	Data quality assessment
DQOs	Data quality objectives
EPA	U.S. Environmental Protection Agency
FDPM	Facility Disposition Program Manual
HF	Hydrogen fluoride
HVAC	Heating, ventilation, air conditioning
IHSS	Individual Hazardous Substance Site
IWCP	Integrated Work Control Package
K-H	Kaiser-Hill
LBP	Lead-based paint
LCS	Laboratory control samples
LSDW	Life safety disaster warning
MARSSIM	Multi-Agency Radiation Survey and Site Investigation Manual
MDA	Minimum detectable activity
MDC	Minimum detectable concentration
NORM	Naturally occurring radioactive material
NRA	Non-Rad-Added Verification
OASIS	Oxford Alpha Spectroscopy Integrated System
OSHA	Occupational Safety and Health Administration
PARCC	Precision, accuracy, representativeness, comparability and completeness
PCBs	Polychlorinated biphenyls
PDS	Pre-demolition survey
PDSP	Pre-Demolition Survey Plan
Po	Polonium
Pu	Plutonium
QC	Quality Control
RCRA	Resource Conservation and Recovery Act
RFCA	Rocky Flats Cleanup Agreement
RFETS	Rocky Flats Environmental Technology Site
RLC	Reconnaissance Level Characterization
RLCR	Reconnaissance Level Characterization Report
RSP	Radiological Safety Practices
SVOCs	Semi-volatile organic compounds
TBD	Technical basis document
TSA	Total surface activity
VOCs	Volatile organic compounds

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## EXECUTIVE SUMMARY

A Reconnaissance Level Characterization (RLC) was performed to characterize 771 Closure Project facilities that were believed to be Type 1 facilities. These facilities had not been fully characterized in the original Building 771/774 Reconnaissance Level Characterization Report (RLCR), dated August 8, 1998. The original RLCR focused on B771, B771C and B774. Facilities characterized in this RLCR include all of the trailers (T771 A – C, E – H, J – M, Q, R, T & MB, T771-DT, and T773S), most of the outbuildings (714A, B715 – B717, B770, B772, B772A, B773, B775, S770, B771B and K771N), and several of the exterior tanks (Tanks 21A, 173, 174, 179, 180, 192, 193 and 197) (i.e., 37 facilities and tanks in total). Environmental media beneath and surrounding the facilities were not within the scope of this characterization.

Physical, chemical and radiological hazards were assessed based on historical reviews, process knowledge, and newly acquired RLC data. The RLC encompassed both radiological and chemical characterization to enable compliant disposition and waste management. Because the facilities were initially classified as Class 3 (RFCA Type 1) facilities, the RLC implemented a Pre-Demolition (Final Status) Survey design to determine whether the facilities can be released (off the site) without restrictions, pursuant to the D&D Characterization Protocol (MAN-077-DDCP).

Results indicate that no radioactive (with the exception of the B770 exterior) or chemical contamination exists in excess of the prescribed limits, and that no significant physical hazards are present. The contamination detected on the exterior of B770 was confirmed to be Americium (Am-241). B715, B773, B771B, T771A, T771C, Tank 180, and the Tank 197 manifold station contain asbestos containing material (ACM). All asbestos containing material (ACM) identified is non-friable, except some of the insulation on B715, which is friable. Fluorescent light ballasts containing PCBs exist in some of the facilities due to their age. All PCB ballasts will be removed and segregated in a separate waste stream prior to disposition of the facilities.

Based upon this RLC, and subject to concurrence by the Colorado Department of Public Health and the Environment, 36 of the 37 facilities are considered to be Type 1 facilities and can be disposed of as sanitary waste/construction debris (except for the PCB ballasts and some ACM). One of the facilities, B770, is considered a Type 2 facility. Facility types, as defined in the Decommissioning Program Plan, are defined as follows:

- Type 1** facilities are considered "free of contamination".
- Type 2** facilities contain no significant contamination or hazards, but are in need of decontamination.
- Type 3** facilities contain significant radiological contamination and/or hazards.

The presence of asbestos and PCB fluorescent light ballasts does not make a facility a Type 2 as long as asbestos and ballasts are removed pursuant to Site asbestos abatement and waste management procedures.

To ensure that the Type 1 facilities remain free of contamination and that Pre-Demolition Survey data remain valid, isolation controls will be established, and the facilities will be posted accordingly.

## 1.0 INTRODUCTION

As part of the Rocky Flats Environmental Technology Site (RFETS) Closure Project, numerous facilities will be removed. Among these are the 771 Closure Project facilities addressed in this Reconnaissance Level Characterization Report (RLCR), including most of the trailers (T771 A – C, E – H, J – M, Q, R, T, DT & MB, and T773 S), most of the outbuildings (B714A, B715 – B717, B770, B772, B772A, B773, B775, S770, B771B and K771N), and several of the exterior tanks (Tank 21A, 173, 174, 179, 180, 192, 193 and 197). These facilities were believed to be Type 1 facilities. These facilities are listed in Table 1-1 and highlighted in Exhibit 1-1. These facilities no longer support the RFETS mission and need to be removed to reduce Site infrastructure, risks and/or operating costs.

Before the facilities can be removed, hazards must be identified. Hazards identified will be used to release some of the facilities and to dispose of others in a compliant manner. This document presents the existing physical, radiological and chemical hazards associated with the facilities, and classifies the facilities pursuant to the RFETS Decommissioning Program Plan (DPP; K-H, 1999). The hazards assessment is based on facility history and process knowledge, operating and spill records, and results of the reconnaissance level characterization (RLC). The RLC was conducted pursuant to the RFETS Decontamination and Decommissioning Characterization Protocol (DDCP; K-H 1999). The content and outline of this RLC report (RLCR) are consistent with the Kaiser-Hill (K-H) Facility Disposition Program Manual (FDPM; K-H, 1998).

### 1.1 Purpose

The purpose of this report is to communicate and document the results of the RLC effort. The purpose includes summarizing the data into a concise, usable format and interpreting the data for use in management decisions, primarily:

- Definition of individual hazards and overall risk associated with facility decontamination and decommissioning (D&D);
- Typing of facilities based on hazards identified;
- Ability to release the facilities from the Site; and
- Waste classification to enable compliant disposal.

### 1.2 Scope

This report covers physical, radiological and chemical characterization of the 37 facilities listed in Table 1-1. Based on the hazards identified, the facilities were typed and assessed against unrestricted release and waste disposal criteria. Environmental media beneath and surrounding the facilities are not within the scope of this characterization. Both facilities and environmental media will be dispositioned pursuant to the Rocky Flats Cleanup Agreement (RFCA).

**Table 1-1 List of the 771 Closure Project Type 1 Facilities**

Facility Number	Facility Description
T771A – C, E – H, J, K, MB, Q, R & DT	Office, Locker, Shower and Break-Room Trailers
T771L	Rest Room Trailer
T771M	Modular Network Operations Center
T771T	Office Trailer; was T881A; characterized as part of Group B RLC
T773S	Skid Mounted Guard Post
B714A	Hydrofluoric (HF) Storage
B715 & B716	Emergency Generators
B717	B771 Sampling Shed
B770	Office and Supply Building
S770	Carpenter Storage Shed
B771B	Carpenter Shop
K771N	Food Bldg, SW of B773
B772	New Site Breathing Air Facility
B772A	HF Acid Pit S. of B772
B773	Old 771 Guard Post
B775	Sanitary Lift Station
Tanks 173,179 & 197	Propane Storage E of T771B, SE of T771G and SE of 774
Tank 174	Liquid Argon Storage N of B771C
Tank 180	Cooling Water Storage On B774 near Cooling Tower
Tanks 192 & 193	Diesel Underground Storage Tanks S of 771 -- empty
Tank 21a	Diesel Aboveground Storage Tank SE of B715

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**Exhibit 1-1 771 Closure Project Map Showing Type 1 Facilities**

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## **2.0 OPERATING HISTORY AND PHYSICAL DESCRIPTION**

### **2.1 Trailer T771A, Offices**

This modular office building was acquired and installed northeast of Building 771 in 1975. The trailer is approximately 24' wide X 60' long X 11' high with approximately 1440 square feet of office space. There are two doors leading into this office building, one on the east side and one on the west side. Both entry doors are covered with a wood structure approximately 4' wide X 8' long X 12' high with 4' wide X 20' long wood ramps leading to each door. The siding and the skirting around the bottom of the trailer, which is approximately 40" high, are constructed from corrugated aluminum. This facility has a metal roof over roof insulation. The tie-down method for the trailer was unknown, because the trailer skirting covered the footing/foundation. Structurally the facility is sound both inside and outside.

The facility's interior outside walls are wood paneling over insulation. The interior partition walls are drywall on stud framing, and the floor is carpet on wood flooring. The trailer has two hard-wall rooms, one at each end of the unit. The ceiling is a drop-ceiling type with acoustical tile. The utilities for this trailer consist of an electric heat pump, which is used for both heating and air conditioning. The trailer is connected to the Site Smoke Detection and Alarm System and the Plant Public Address System.

T771A is currently in use and has always been used as an office facility. Radioactive materials and chemicals have never been used or stored in this office facility.

### **2.2 Trailer T771B, Offices**

This trailer was acquired and installed northeast of Building 771 in 1975. The size of this trailer is approximately 24' wide X 60' long X 9' high with approximately 1440 square feet of office space. There are two doors leading into this trailer, both of them on the south side. Both entry doors are covered with a wood structure approximately 4' wide X 4' long X 8' high with wood ramps leading to the entry doors, approximately 4' wide X 6' long. The siding and the skirting around the bottom of the trailer, which is approximately 40" high, is enamel on aluminum. This facility has a metal roof over roof insulation. The tie-down method for the trailer is unknown, because the trailer skirting covered the footing/foundation. Structurally the facility is sound both inside and outside.

The facility's interior outside walls are wood paneling over insulation, the interior partition walls are wood paneling on stud framing, and the floor is carpet on wood flooring. The trailer has two hard wall rooms, which are constructed using drywall and metal stud walls, one at each end of the unit. The ceiling is drop-ceiling type with acoustical tile. The utilities for this trailer consist of a propane heat pump, which is used for both heating and air conditioning. The trailer is connected to the Site Smoke Detection and Alarm System and the Plant Public Address System.

T771B is currently in use and has always been used as an office facility. Radioactive materials and chemicals have never been used or stored in this office facility.

### **2.3 Trailer T771C, Locker and Shower Facility**

This trailer was acquired and installed northeast corner of Building 771 in June of 1983. The size of this trailer is approximately 10' wide X 50' long X 8' high. The facility contains approximately 520 square feet of floor space. There are three doors leading into this trailer; one is on the east side, and two are on the north side. The east side entry has 5 wood steps with handrails. The north two entry doors are covered with a wood structure approximately 4' wide X 4' long X 12' high with 4-6 wood steps, and the west end has a wood dock area. The siding and the skirting around the bottom of the trailer, which is approximately 28" high, is enamel on aluminum. This facility has a metal roof over insulation. The tie-down method for the trailer is unknown, because the trailer skirting covers the footing/foundation. The trailer's interior outside walls are wood paneling over insulation, the interior partition walls are wood paneling on stud framing, and the floor is carpet on wood flooring. The ceiling is drop-ceiling type with acoustical tile. Structurally the trailer is sound both inside and outside.

The trailer is currently in use and has always been used as a locker and shower room. The utilities for this trailer consist of electricity, an electric heater, domestic water, and an electric hot water heater. The facility is hooked up to the Building 771 sewer system to support the shower facilities, as well as the fire sprinkler system and the alarm system. Radioactive materials and chemicals have never been used or stored in this facility.

### **2.4 Trailer T771E, Offices**

T771E was acquired and installed northwest of Building 773 in 1985. In 1993 T771H was moved in and attached to the north side of T771E. The size of T771E is approximately 29' wide X 60' long X 11' 4" high with approximately 1440 square feet of office space. There are four doors leading into this trailer, three of them on the south side and one on the east side of the trailer. All of the entry doors are covered with a wood structure approximately 4' wide X long 4' X 8' high. The entry doors have wood steps leading up to them, which are approximately 4' wide X 6 long'. The siding and the skirting around the bottom of the trailer, which is approximately 40" high, is enamel on aluminum. This office facility has a metal roof over roof insulation. Structurally the facility is sound both inside and outside. The tie-down method for the trailer is unknown, because the trailer skirting covered the footing/foundation.

The facility's interior outside walls are wood paneling over insulation, the interior partition walls are wood paneling on stud framing, and the floor is carpet on wood flooring. The trailer has six hard-wall office rooms. The ceiling is drop-ceiling type with acoustical tile. The utilities for this trailer consist of an electric heat pump, which was used for both heating and air conditioning.

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T771E is currently in use and has always been used as an office facility. Radioactive materials and chemicals have never been used or stored in this office facility.

## **2.5 Trailer 771F, Offices**

This trailer was constructed/assembled in 1985 at its present location, directly west of the Building 771 old Guard Post, Building 773. T-771F is approximately 28' wide X 70' long X 11' high for approximately 1960 square feet, and it is assembled from 2 trailer units of approximately 14' wide X 70' long feet in size. There are two doors leading into this trailer, which are located on the south side of the trailer. The entry doors are covered and are approximately 4' wide X 4' long X 10' high. The office trailer is covered with a corrugated metal siding. The skirting around the bottom of the trailer, which is approximately 28" high, is enameled metal. This office facility has a metal roof over roof insulation. Structurally the trailer is sound both inside and outside.

The facility's interior outside walls are wood paneling over insulation, the interior partition walls are wood paneling on stud framing, and the floor is carpet on wood flooring. The trailer has six hard-wall office rooms. The ceiling is drop-ceiling type with acoustical tile. The utilities for this trailer consist of an electric heat pump, which was used for both heating and air conditioning.

Trailer T771F is currently in use and has always been used as an office facility. Radioactive materials and chemicals have never been used or stored in this office facility.

## **2.6 Trailer T771G, Locker and Shower Facility**

This trailer was placed in service in 1985 at its present location, which is approximately 100' north of Building 774. The facility has been a locker and shower facility since then, although its prior history is unknown. The size of the trailer is approximately 9' wide x 66' long x 11' high with approximately 1200 square feet of space, which includes the wood constructed dock and door entryways. There are two entry doors with wood steps, both on the south side. The unit siding is baked on painted sheet metal. Some of the skirting at the bottom of the north side the trailer has been removed. There are two windows in the south wall, one window in the east wall, and four windows in the north wall. This facility has a metal roof over roof insulation.

The facility is currently in use. It has a propane hot-water heater and a propane heating furnace. Other utilities for T771G include two exterior wall mounted swamp coolers for cooling the facility during the summer months. Propane Tank 179, which is located south east of T771G, supplies all of the propane gas needs to heat the facility and provide hot water for the showers. The facility has a fire sprinkler system and alarm system, and is connected to the Plant Public Address System.

## 2.7 Trailer T771H, Offices

This trailer was placed on site in 1993. T771H was installed directly north of T771E and it was attached to the north wall of T771E. Trailers T771H/E are located approximately 150' northwest of Building 773, the old Building 771 Guard Post. The size of this office trailer is approximately 28' wide X 60' long X 10' high. Office Trailer T771H has approximately 1848 square feet of office space. The entry doors are covered and are approximately 4' wide X 4' long X 10' high. The office trailer is covered with a corrugated metal siding. This office facility has metal roofing over insulation. This facility has corrugated plastic skirting all around the base. The facility's interior-outside walls are wood paneling over insulation, the interior partition walls are wood paneling on stud framing, and the floor is carpet on wood flooring. The trailer has six hard wall office rooms. The ceiling is drop-ceiling type with acoustical tile. Structurally the trailer is sound both inside and outside.

T771H is currently used as an office facility and has always been used as an office facility. The utilities for this trailer consist of electric heat pumps, which are used for both heating and air conditioning. Radioactive materials and chemicals have never been used or stored in this office facility.

## 2.8 Trailer T771J, Offices

This trailer was constructed/assembled in 1984 at its present location, which is approximately 200' directly west of the Building 771 old Guard Post, Building 773. The size of this trailer is approximately 28' wide X 60' long X 11' high for 1960 square feet, and it is assembled from 2 trailer units of approximately 14' X 60' feet in size. There are two doors leading into this trailer, which are located on the north side of the trailer. The entry doors are covered and are approximately 4' wide X 4' long X 10' high. The office trailer is covered with a corrugated metal siding. The skirting around the bottom of the trailer, which is approximately 28" high, is enameled metal. Structurally the trailer is sound both inside and outside.

The facility's interior outside walls are wood paneling over insulation, the interior partition walls are wood paneling on stud framing, and the floor is carpet on wood flooring. On the inside of the unit there are two hard-wall offices. One is located in the south east corner and is approximately 12' wide x 15' long, and the other hard-wall office is located in the north east corner of the trailer and is approximately 8' wide X 10' long. The ceiling is drop-ceiling type with acoustical tile.

Trailer T771J is currently in use as an office facility and has always been used as an office facility. The utilities for this trailer consists of two electric heaters/air-conditioners located outside on the west wall. There are 12 surface-mounted two-tube fluorescent ceiling lights, and many duplex outlets in the perimeter walls. The trailer is connected to a smoke detection system, alarmed locally, and the Plant Public Address System. Radioactive materials and chemicals have never been used or stored in this office facility.

## 2.9 Trailer T771K, Offices

This trailer was constructed/assembled in 1984 at its present location, which is approximately 200' directly west of the Building 771 old Guard Post, Building 773. The size of this trailer is approximately 28' X 70' X 11' high for approximately 1960 square feet of floor space. This trailer is assembled from 2 trailer units of approximately 14' X 70' feet in size. There are two doors leading into this trailer, which are located on the north side of the trailer. The entry doors are covered and are approximately 4' X 4' X 10' high with wood steps up to the door entry. The office trailer is covered with a corrugated metal siding. The skirting around the bottom of the trailer, which is approximately 28" high, is enameled metal. Structurally the trailer is sound both inside and outside.

The facility's interior outside walls are wood paneling over insulation, and the interior partition walls are wood paneling on stud framing. There are two hard-wall offices. One is located in the south west corner and is approximately 12' wide x 15' long, and the other is located on the north wall, approximately in the center of the wall, and is approximately 8' wide X 10' long. The interior perimeter walls consist of wood panel boards, 1/4" thick, over insulation. The two office walls are constructed out of gypsum wallboard material. The ceiling is a drop ceiling with acoustical tile and boards that span the short width of the trailer, held in place with 1" wide wood strips. This unit has carpet floor covering over plywood.

This trailer is currently in use as an office trailer facility and has always been used as an office trailer. The utilities for this trailer consists of two electric heaters/air-conditioner units located outside on the north wall. The trailer has a smoke detection system, alarmed locally, and is connected to the Plant Public Address System. There are 12 surface-mounted, two-tube fluorescent ceiling lights and many duplex outlets in the perimeter walls. Radioactive materials and chemicals have never been used or stored in this office facility.

## 2.10 Trailer T771L, Rest Room Facility

Trailer T771L was placed on site in 1987 as a rest room facility. It is located approximately 30' directly east of T771J. The facility is prefabricated and modular. The facility is approximately 10' wide X 32' long X 10' high, for approximately 320 square feet of space. The unit siding is baked on painted sheet metal. The facility has a 28" metal skirt around the foundation. T771L has a metal roof over roof insulation. There are two entries, both on the north side. There are steps up from grade.

The facility houses both men's and women's rest room facilities with hot and cold running water. The utilities for this trailer include electric heat, an electric hot water heater, and fluorescent lighting. The facility has a sewage lift-station associated with it. T771L has always been used as a rest room facility. Radioactive materials and

chemicals have never been used or stored in this facility, however, rest room cleaning chemicals are routinely used to clean the facility.

### **2.11 T771M, Modular Network Operations Center Facility**

T771M was placed on site in 2000. It is located directly west of T771K near the north end of the trailer. This facility is approximately 8' wide X 14' long X 9' high for approximately 112 square feet of floor space. The facility houses the Network Operations Center (NOC), which is a portable telecommunications unit. This facility was installed to provide additional network capability for the offices, computers and telephones that will be installed in the additional office trailers that have been installed in the Building 771 complex. There is one entry door on the north side of the facility. There are no steps up from grade. The unit's exterior siding is a pre-fabricated construction panel, which contain pea-sized gravel embedded into the surface of the construction panels. T771M has a slightly peaked metal-covered roof.

There are no occupants in the facility; it contains only telecommunications equipment. Utilities for this facility include electricity and a heat pump for heating and air conditioning. Radioactive materials and chemicals were never used or stored in this office facility.

### **2.12 Trailer T771MB, Office and Break Room Facility**

Trailer T771MB contains one office and one break room/conference room. This trailer was placed in the Building 771 complex in September 1999. The facility is located approximately 60 feet northwest of T773S, the temporary skid-mounted guard post for the Building 771 Cluster Facilities. The size of the trailer is approximately 12' wide x 24' long x 10' high with approximately 480 square feet of floor space. T771MB has only one entry door, which is located on the south side. There are four steps up from grade with wooden handrails, and the entry door has a 4' wide X 6' long X 8' high plywood cover. The unit siding is baked on painted sheet metal. All of the skirting at the bottom of the trailer has been removed. The trailer has corrugated metal siding over insulation. The roof is corrugated metal sloped for drainage.

T77MB is currently being used as an office and break room facility, and has always been used as such. The utilities for T-771MB consist of electricity and an electric heat pump, which is used for both heating and air conditioning. The trailer is hooked up to the Plant Smoke Detection System and the Plant Public Address System. Radioactive materials and chemicals were never used or stored in this office facility.

### **2.13 Trailer T771Q, Offices**

This office trailer was moved to its current location during the spring of 2000. This facility was formerly T883C. The size of this trailer is approximately 28' wide X 70' long X 11' high for approximately 1960 square feet of floor space. The office trailer is

assembled from 2 trailer units of approximately 14' wide X 70' long. There are two doors leading into this trailer, which are located on the north side of the trailer. The entry doors are covered and are approximately 4' X 4' X 10' high. The exterior of this office trailer facility has painted aluminum skin. The office presently does not have skirting around the bottom of the trailer. The tie-down method for the unit is metal bands down to steel rods driven into the asphalt pavement below. Structurally the trailer is sound both inside and outside. T771Q does not have any visible roof leaks.

The interior outside walls is wallpaper-clad dry wall over insulation, the interior partition wall is wallpaper-clad dry wall on stud framing, and the floor is carpet on wood flooring. The ceiling is drop type with acoustical tile 2' X 4' panels. The utilities for this trailer consists of two electric heaters/air-conditioner units located outside on the west wall. The trailer has a fire sprinkler and alarm system, but it is not operable.

T771 Q is and always has been an office facility. Radioactive materials and chemicals have never been used or stored in this office facility.

#### **2.14 Trailer T771R, Offices**

This office trailer was moved to its current location during the summer of 2000. This facility was formerly T119A. The size of this trailer is approximately 28' wide X 70' long X 14' high for approximately 1960 square feet of floor space. This trailer is assembled from 2 trailer units of approximately 14' wide X 70' long. There are two doors leading into this trailer; one is located on the east side of the trailer, and the other door is located on the west side of the trailer. The entry doors are covered and are approximately 4' wide X 8' long X 10' high. The exterior of this facility has painted aluminum skin. The office presently does not have skirting around the bottom of the trailer. The tie-down method for the unit is metal bands down to steel rods driven into the asphalt pavement below. Structurally the trailer is sound both inside and outside. T771R does not have any visible roof leaks.

The interior outside walls are wallpaper-clad dry wall over insulation, the interior partition wall is wallpaper-clad dry wall on stud framing, and the floor is carpet on wood flooring. The ceiling is a drop type with acoustical tile 2' X 4' panels. The utilities for this trailer consists of two electric heaters/air-conditioner units located outside on the west wall. The trailer has a fire sprinkler and alarm system, but it is not operable.

T771 R is and always has been an office facility. Radioactive materials and chemicals have never been used or stored in this office facility.

#### **2.15 Trailer T771T, Break Room Facility**

This trailer was moved to its current location during the spring of 2000. This facility was formerly T881A. The size of this trailer is approximately 14' wide X 70' long X 9' high. There are two doors leading into this trailer, both of them are on the north side. Both entry doors are covered with a wood structure approximately 4' wide X 4' long X 12' high

with 4-6 wood steps. The office presently does not have skirting around the bottom of the trailer. The tie-down method for the unit is metal bands down to steel rods driven into the asphalt pavement below. The trailer has many signs of roof leaks, which show up in the acoustical ceiling tiles near the outside walls.

The trailer's interior-outside walls are wood paneling over insulation, the interior partition walls are wood paneling on stud framing, and the floor is carpet on wood flooring. The trailer has two hard-wall rooms, one at each end of the unit. The ceiling is drop-ceiling type with acoustical tile 4' wide X 14' long panels. The two doors have key locks on them. The utilities for this trailer consist of an electric heat pump, which is located on the west end of the trailer and used for both heating and air conditioning.

T771 T is and always has been an administrative facility. Radioactive materials and chemicals have never been used or stored in this office facility.

#### **2.16 Trailer 771-DT, Decon Trailer**

The 771-DT Decon Trailer is a shower and decontamination facility mounted on a trailer. It is located north of Building 774 and directly west of the T771G Locker/Shower Facility. 771-DT is approximately 18' long X 8' wide X 8' high and contains approximately 96 feet of floor space. The Decon Trailer has two entrance doors, one on the north and one on the southwest corner of the trailer. The exterior walls of 771-DT are covered with enameled corrugated metal over wall insulation. The roof is a single piece of aluminum formed over insulation.

The facility is self-contained (i.e., it has its own heat, hot water heaters, and air conditioning). The facility also has two propane gas bottles mounted on the front. Electrical power for 771-DT facility comes from a power pole shared with T-771G. Other 771-DT equipment is stored and covered on the ground directly east of the facility. Radioactive materials and chemicals were never used or stored in this office facility.

#### **2.17 Trailer T773S, Guard Post**

T773S is a temporary skid-mounted guard post being used as the inside Guard Post for the "Building 771 Security Bubble". This guard post was placed in service in February 2000. It is located directly north of Building 773, the old Building 771 Guard Post. T771S is approximately 10' wide X 12' long X 10' high with approximately 130 square feet of floor space. There is only one entry, which is located on the south side. The unit's exterior siding is cedar-type wood siding.

T771S has always been used as a guard post. Utilities for this facility include electricity, electric heat, and air conditioning. Radioactive materials and chemicals have never been used or stored in this facility.

## **2.18 Building 714A, Storage Facility**

Building 714A is located south of Building 714. Building 714A was constructed during the 1964-1965 Building 771 Modification time frame. Building 714A is 4'8" W X 48' L X 4'10" H covering 224 square feet. It is a metal frame and siding structure set on concrete piers. The structure has corrugated metal bolted to the structural steel framework on three sides. The fourth side is the opening to the storage shed. Six double-metal mesh doors that could be padlocked cover this opening. The roof is made of corrugated metal and slopes to the north.

When the Building 771's Pu Recovery fluorination process was changed from a batch to a continuous process, use of HF increased, and there was a need to have more HF cylinders on hand. Building 714A was built to store full and empty HF cylinders. There are no utilities to the facility. Building 714A is empty and out of service.

## **2.19 Building 715, Emergency Generator**

Building 715 was built in 1975 to house Emergency Generator # 1 for Buildings 771 and 774. The building is constructed of concrete blocks and houses a diesel-powered generator and the necessary control equipment to operate the system. It is 33'4" L X 22'9" W X 18' H covering 824 square feet. The building was built on an above-grade reinforced-concrete slab six inches thick tied to foundation walls. The walls are of concrete block construction with horizontal reinforcing at various intervals, and vertical steel reinforcing bar at the corners and at selected points in the walls. At the points where there is reinforcing bar, grout was poured into the void space in the blocks. The roof is a poured-steel reinforced-concrete slab six inches thick.

Building 715 is in service. There is no heating, ventilation and air conditioning in Building 715. There is battery power to start the diesel motor and a block heater to keep the diesel motor warm for instant starting. The facility also has a fire sprinkler and alarm system.

## **2.20 Building 716, Emergency Generator**

Building 716 is the Emergency Generator # 2 for Buildings 771 and 774. It is a containerized unit containing a diesel-powered generator and a roof mounted muffler and exhaust stack. The generator is built into an 8' W X 40' L X 9'2" H cargo container for 286 square feet of floor space. The foundation consists of 18 spring-mounted vibration-dampening devices, which rest on a concrete slab slightly larger than the cargo container dimensions. The floor of the cargo container was reinforced to

withstand the weight of the diesel motor and the generator. One wall has an entrance door and an air inlet with louvers. The roof is the metal top of the cargo container, reinforced where the muffler and exhaust stack are positioned. The Building 716 walls are of ribbed-painted metal.

Building 716 is in service. It has no heating, ventilation or air conditioning. Utilities needed for this facility are battery power to start the diesel motor and a block heater to keep motor warm at all times for instant starting. The facility also has a fire sprinkler and alarm system.

### **2.21 Building 717, Sampling Shed**

Building 717 was the magnehelic building/sampling shed for the Building 771 exhaust stack. It is 9' L X 7' W X 8' H covering 48 square feet of floor space. It has black-iron framed slopping roof and black-iron framed building structure with corrugated metal sides and roof. The facility has one glass-panel painted-steel access door. The facility was constructed to protect instruments from the weather when the Building 771 exhaust stack gases were sampled. The building is not in service. Radioactive materials and chemicals have never been used or stored in this facility.

### **2.22 Building 770, Offices and Stockroom Facility**

Building 770 is a 62' L X 50' W X 22' H metal pre-fabricated modular building that was built in 1965 to be used as a construction fabrication shop and pipe shop. It contains approximately 2,860 square feet and is built on a concrete slab that is tied into the building foundation walls. The walls are vertical-standing, corrugated 11-gage sheet metal panels over a Butler-type frame. On the west and south sides there are rollup truck doors and a man-door. The roof is made of corrugated 11-gage sheet metal slopping to the north and south.

Presently it is used as a Building 771 supplies storeroom, and for offices and a war room. The walls for the offices are gypsum board over steel studs. The ceilings in the offices are gypsum board over steel studs. Electric heaters supply heating for the offices. Air conditioning is supplied by swamp coolers located in the west and east side of the building at the top of the gable. Electricity is the only utility supplied to the building. The facility is connected to the Smoke, Heat Detection and Fire Alarm System. Radioactive materials and hazardous chemicals have never been used or stored in this facility.

### **2.23 S770, Carpenter Storage Shed**

S770 is the Carpenter Storage Shed and is located directly north of Building 771B. The facility was constructed and put into service at its present site in 1970. The storage shed is constructed from plywood, built on skids, and is approximately 6' wide X 16' long X

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10' high. The storage shed has one set of double-plywood doors, which face east. The roof of the storage shed is covered with corrugated metal. All of the facility walls are painted plywood.

The facility is in service as an unheated storage facility. The storage shed does not have any heat or utilities. Radioactive materials and hazardous chemicals have never been used or stored in this facility.

## **2.24 Building 771B, Carpenter Shop**

Building 771B is the Carpenter Shop for the Building 771/774 Cluster facilities. The facility is north of Building 771 and approximately 35 feet west of Building 770. Building 771B was built and placed into service in 1970. Building 771B is approximately 25' long X 18' wide X 9' high at the roof peak, and the facility has approximately 564 square feet of floor space, which includes add-on constructed storage space. The facility is constructed from wood on a poured concrete slab. The facility has two sets of double wooden doors and two single entry doors, all of which are on the east side of the building. The Building 771B roof is covered with corrugated metal over insulation. The exterior walls are covered with vinyl siding over insulation.

The Building 771B Carpenter Shop is in service. Utilities include electrical power to operate the various electrical carpenter tools and to provide electrical heat. Radioactive materials and hazardous chemicals have never been used or stored in this office facility. Product chemicals such as caulking, sealants, glues, etc. are used and stored in the Building 771B Carpenter Shop.

## **2.25 Building K771N (aka Building B771K)**

Building K771N is a pre-fabricated modular facility that was moved as a newly constructed facility next to Building 773 in 1999 to serve as a hot-food building for the Building 771/774 Cluster. It is located approximately 8 feet southwest of Building 773. The size of K771N is approximately 10' wide X 17' long x 10' high with 160 square feet of floor space. There are two entries, one on the north side and one on the east side, with one window on the west side. The unit siding is baked-on enamel corrugated sheet metal over insulation. The roof also is corrugated metal over insulation. The facility is skid-mounted.

The facility presently is not being used, and it is locked. Utilities are electric power for heating, cooling, and keeping food hot until served. K771N has always been a building to serve hot food. Radioactive materials and chemicals have never used or stored in this facility.

## **2.26 Building 772, New Breathing Air Facility**

Building 772 is 37'10" long X 30' wide X 16' high with 1129 square feet of floor space. It was constructed in 1992 and equipped to supply HF to the process in Building 771.

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However, the HF supply facility never went operational (HF was never introduced to the equipment). When production at Rocky Flats was stopped, B772 was stripped out of its equipment in 1999 and converted to a supplied breathing air facility. There are two breathing air systems currently installed in the building. Two oil-free compressors are located at the east end of the building. The receiver tanks, conditioner equipment, and monitoring equipment and instrumentation for air quality are located in the west end.

B772 is constructed of cement blocks. The foundation walls are three feet below grade, which support an on-grade 6-inch thick reinforced, concrete slab. The roof is of a metal-pan construction and has a gutter on the east end of the building. The walls are cement block 15 feet high with horizontal reinforcement at intervals. There are two man-doors, one each in the east and west ends of the building and an outside wall-mounted rollup truck door on the east side. The building has no windows in it. There is no suspended ceiling in the building. The lights and the original overhead crane monorail are suspended from the I-beams, which are supported by the north and south walls. The overhead crane has been removed, but the monorail is still in place. There is no heating, ventilation and air conditioning. Electric and emergency power for the building comes from Building 771. Building 772 currently is not in operation supplying breathing air for Building 771. The facility is being SO tested and certified for breathing-air use and will be put into service later in FY 2001.

### **2.27 Building 772A, HF Pit**

Building 772A is a 26' long X 13' wide X 6'6" deep, poured reinforced concrete pit, covering 400 square foot. The concrete structure is an open scrubber pit. The facility was never completed due to the stoppage of production work at Rocky Flats. It was to be the support structure for the scrubber system for the HF building. The one-foot above and the five-foot below grade concrete structure supports 18" steel I-beams that were put into place. Building 772A was never used and will never be put into service.

### **2.28 Building 773, Old 771 Guard Post**

Building 773 was the original guard post that personnel entered to gain access to Building 771. It was built in 1953. It is 14' long X 13'7" wide X 10' high covering 190 square feet of floor space. The facility is constructed from reinforced concrete that has windows on all sides and three doors. There is a low counter separating the security personnel from the Building 771 personnel entering and exiting the building through two of the doors.

The foundation is a footing approximately two feet below grade that supports the walls. The walls are poured-in-place reinforced concrete that have columns between the window and door openings that go to the roof to support it. At the window openings there is a sloping-out poured-sill plate. The top of the sill plate is five feet above the floor. The windows are of the multi-paned steel sash type. The roof is a poured-in-place

reinforced concrete slab that extends three feet from the walls. The floor is a poured-in-place, on-grade reinforced concrete slab. The doors are made of steel with two wire reinforced glass panes in the top half of the door. Heating for the building is provided by wall-mounted electric heating units. The original building was not air-conditioned.

When the PAC was completed, the facility was converted for use as an Incident Command Post. When the building was converted to the incident command center, a roof-mounted air conditioner was put in place to cool the electronics that were placed in the building. The duct for the air was brought into the building through a hole in the roof. Electricity, emergency power, and the Life, Safety/Disaster Warning System all comes from Building 771. Presently, Building 773 is unused. Radioactive materials and chemicals have never used or stored in this facility.

### **2.29 Building 775, Sanitary Sewage Lift Station**

Building 775 is the sewage lift station for the Building 771 Cluster sewage system. It was built in 1953. It is 16' long X 9' wide X 6' high structure. The 152 square foot building sits over the sewage receiver tank and covers the pumping system that lifts the sewage up the hill and into the gravity drain system to the sewage treatment facility in Building 995.

The foundation for the building is the top of the sewage tank. The building construction is of reinforced concrete. The walls start two feet below grade and extend four feet above grade, support the roof, and are 8 inches thick. There is one entrance into the building on the north side, which has a locked steel door. The roof is a poured reinforced concrete six-inch thick slab that extends six inches from walls. A vent pipe goes through the roof to allow the sewer gases to escape from the sewage holding tank under the building. The walls of the building inside and out are not painted, but the steel door is painted. The ceiling of the building is the under side of the roof slab and is not painted.

There is no heating, ventilation and air conditioning in the building. Electric power is supplied from Building 771. Possible hazards associated include biological hazards. Building 775 is in service.

### **2.30 Building 771/774 Cluster Tanks**

The following is a listing of Building 771/774 Cluster Tanks along with a brief description of each tank and current status:

- Tank 173, Propane Storage Tank, located southwest of T771B Office Trailer, supplies gas for heating and cooling in the office trailer. Tank 173 is in service.

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- Tank 174, Liquid Argon Storage Tank, located north of Building 771C, is operational empty and is Out of Service. Tank 175, (formerly a Liquid Nitrogen Storage Tank, was located north of Building 771C, has been removed)
- Tank 179, Propane Storage Tank, located southeast of T771G, used for heating and hot water in the T-771G and 771-DT Locker and/or Shower Facilities. Tank 179 is in service.
- Tank 180, Cooling Water Storage Tank, located south of Building 774 on the roof near the Building 774 Cooling Tower. Tank 180 operational empty and is Out of Service.
- Tank 192 Underground Diesel Storage Tank, aka Diesel UST Tank 20, located west of Building 714A. Tank 192 is Out of Service and has been filled with foam.
- Tank 193 Underground Diesel Storage Tank, aka Diesel UST Tank 21, located southeast of Building 715. Tank 193 is Out of Service and has been filled with foam.
- TK-21A Aboveground Diesel Storage Tank, aka TK-21, located southeast of Building 715. TK-21A is in service.
- Tank 207 (aka Tank 197) LP Gas Storage Tank 450-781, 18,377-gallon capacity, located southeast of Building 771/774, Out of Service.

### **3.0 SUMMARY OF CHARACTERIZATION ACTIVITIES**

An RLC was designed to demonstrate that DOE-added radioactive materials are not present or have been removed to the extent that residual levels of contamination are below the Derived Concentration Guideline Levels (DCGLs) and that the facilities can be released without restrictions and/or disposed of as sanitary waste/construction debris. This section of the RLC Report (RLCR) presents data quality objectives (DQOs) used, historical and process knowledge, and additional characterization performed to release the 37 facilities. Section 3.0 also describes the survey units for characterizing the facilities, and defines the methods used to perform radiological surveys, scans and sampling. The RLC followed the guidance provided in the site Pre-Demolition Survey Plan (PDSP).

As indicated in Sections 1.0 and 2.0, T771Q and T771T were included in this RLC. However, these facilities were previously characterized under the Group B RLC and were not characterized as part of this RLC. T771Q was T883C, and T771T was T881A. Both were moved into the 771 complex and renamed. Refer to the Group B RLCR and project file for characterization data.

#### **3.1 Data Quality Objectives**

The following section revisits the original DQOs used in designing the RLC Characterization Package.

##### ***The Problem***

The problem consists of the unknown volume of floors, walls, ceilings and roofing, and the unknown extent of radiological and chemical contamination on and in floors, walls (interior and exterior), ceilings and roofing.

##### ***The Decision***

The decision is whether release criteria for radiological and chemical constituents have been met (see Decision Rules below), based on types and quantities of any radiological and chemical contamination present.

##### ***Inputs to the Decision***

The inputs to the decision include historical and process knowledge; data collected from this RLC; and release criteria and waste management regulations (see Decision Rules below).

##### ***Decision Boundaries***

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The decision boundaries include the floors, walls (interior and exterior), ceilings, roofing and any fixed equipment associated with the 37 facilities listed in Table 1-1. Environmental media were not considered within the project boundaries.

### ***Decision Rules***

This section presents the rules to support the characterization decisions, specific to each type of contamination. Decision rules are applied based on process knowledge, facility walkdowns, and/or radiological surveys.

#### **Radionuclides**

- If all radiological survey and scan measurements are below the surface contamination guidelines provided in DOE Order 5400.5 (Radiation Protection of the Public and Environment), the related surface is considered not radiologically contaminated.
- If any radiological survey or scan measurement exceeds the surface contamination guidelines provided in DOE Order 5400.5, the related survey unit must be evaluated per the statistical tests described in Section 7.0 of the RFETS Pre-Demolition Survey Plan.
- If any radiological sample measurement exceeds the volume contamination thresholds provided in the NRA Verification Program (refer to Kaiser-Hill letter to DOE, RFFO, Application of Surface Contamination Guidelines from Department of Energy Order 5400.5 – WAH-064-98, March 10, 1998), the related volume is classified as radiologically contaminated.

#### **Hazardous Waste**

If decommissioning waste is mixed with or contains a listed hazardous waste, or if the waste exhibits a characteristic of a hazardous waste, then the waste is considered hazardous waste in accordance with 6 CCR 1007-3, Part 261 and 268.

#### **Hazardous Substances**

If material contains a listed hazardous substance above the CERCLA reportable quantity (40 CFR 302.4), the material is subject to CERCLA regulation (i.e., notification requirements).

#### **Beryllium**

If surface concentrations of beryllium are equal to or greater than  $0.2 \mu\text{g}/100 \text{ cm}^2$ , the material is considered beryllium contaminated per 10 CFR 850.31.

### **Polychlorinated Biphenyls (PCBs)**

- If material contains PCBs from the manufacturing process, the material is considered PCB Bulk Product Waste and subject to the requirements of 40 CFR 761.
- If PCB contamination from a past spill/release is suspected, or if a PCB spill is discovered that has not been cleaned up, the associated material is considered PCB Remediation Waste and subject to the requirements of 40 CFR 761.
- If a waste or item contains PCBs in regulated concentrations, the waste or item is considered PCB-regulated material and subject to the requirements of 40 CFR 761.

### **Asbestos**

If any one sample of a sample set representing a homogeneous medium results in a positive detection for asbestos (i.e., >1% by volume), then material is considered asbestos containing material (ACM; 40 CFR 763 and 5 CCR 1001-10).

#### ***Tolerable Limits on Decision Error***

Tolerable limits on decision error (95% confidence) are applied to the MARSSIM design of survey and sampling plans, as well as actual measurement data resulting from implementation of the plans. Survey area size limits are based upon the requirements of Table 1 of PRO-475-RSP-16.01. Survey areas were developed based on current radiological postings, the procedurally driven size limitations, function and use of area, and where possible, maintaining contiguous survey areas.

Decision error does not apply to asbestos sample sets per 40 CFR 763. Results are compared with the decision rule on a sample-by-sample basis.

#### ***Optimization of Plan Design***

Radiological characterization was conducted on interior floors, walls and ceilings, and exterior walls and roofs as necessary. The following criteria were used to develop the radiological survey/sampling characterization package:

- Radiological field measurement methods and instrumentation are described in Section 3.0 of the site PDSP (MAN-127-PDSP).
- Radiological sampling and preparation for laboratory measurements are described in Section 3.0 of the site PDSP (MAN-127-PDSP).

If hazardous waste, hazardous substance, beryllium, PCB or asbestos surveys/samples are required, sampling and analysis are conducted in accordance with Section 6.0 of the D&D Characterization Protocol.

### 3.2 Radiological Characterization

Radiological characterization was performed to define the nature and extent of radioactive contamination that may be present on or in the 37 facilities. This section reviews the historical radiological information on these facilities, or lack thereof, and discusses the RLC conducted. Radiological hazards are discussed in Section 4.0, and RLC data are presented in Attachments A - AC of this report. The RLC radiological survey packages containing field data are maintained in the 771 Closure Project RLC file.

#### 3.2.1 Summary of Historical Information

Historically, radiological surveys for the B771 outbuildings, trailers and tanks may have been performed, but the data are not readily available. There are no Plant Action Tracking System items outstanding on these facilities, which indicates no associated radiological program deficiencies.

#### 3.2.2 Summary of RLC Data Collected

Although historical review indicates no use of DOE-added radioactive material in the B771 outbuildings, trailers and tanks, insufficient quantitative radiological data existed to designate these structures as non-impacted pursuant to the site PDSP. Therefore, radiological surveys were performed in and on all facilities. A summary of each survey unit and the data collected is provided in Table 3-1. Survey unit maps are provided in Attachment AA.

**Table 3-1 Survey Units and Data Types for 771 Closure Project Type 1 Facilities**

SURVEY AREA	SURVEY UNIT	TYPE	CLASS	DESCRIPTION <sup>(5)</sup>	% SCAN	# TSAs/ SMEARS	# RAD. SAMPLES
AJ	771001	1	3	B772	10	15	0
	771002	1	3	T771A Interior	10	15	0
	771003	1	3	T771B Interior	10	15	0
	771004	1	3	T771C Interior	10	15	0
	771005	1	3	T771E Interior	10	15	0
	771006	1	3	T771G Interior	10	15	0
	771007	1	3	T771H Interior	10	15	0
	771008	1	3	T771J Interior	10	15	0
	771009	1	3	T771K Interior	10	15	0

	771010	1	3	Exterior of Trailers E, H, J, K	10	15	0
	771011	1	3	Exterior of Trailers A, B, C, G	10	15	1 <sup>(1)</sup>
	771012	1	3	T771F	10	15	0
	771013	1	3	T771L	10	15	0
	771014	1	3	T771MB	10	15	0
	771015	1	3	T771M, S770 & K771N	10	15	0
	771016	1	3	714/714A	10	15	1 <sup>(1)</sup>
	771017	1	3	715/716/717	10	15	1 <sup>(1)</sup>
	771018	1	3	772A	10	15	0
	771019	1	3	770/771B	10	15	1 <sup>(1)</sup>
	771020	1	3	B773/T773S/B775	10	15	1 <sup>(3)</sup>
	771023	2	2	B728 Exterior (Process Waste Pit)	50	15	1 <sup>(3)</sup>
	771024	1	3	Tank Exteriors T-774B, T-21A, T- 182, T-183, T-194, T-195 & T-197 (Covers Only)	10	9 <sup>(4)</sup>	0
	771025	1	3	Tank Exteriors T-774A, T-173, T- 174, T-176, T-179, T-180, T-184 & T- 185 (Cover Only)	10	6 <sup>(4)</sup>	0
AI	771026	N/A	N/A	IDEC West End Interior	10	7 <sup>(2)</sup>	0
	771027	N/A	N/A	IDEC East End Interior	10	7 <sup>(2)</sup>	0
	771030	1	3	T771R T771-DT	10	15	0

- (1) Coupon sample collected to verify the presence of Po-210 versus DOE-Added Radioactivity.
- (2) Survey could not be completed due to equipment interference. PDS will be completed following equipment removal.
- (3) Concrete samples collected to verify the presence or absence of DOE-Added Radioactivity.
- (4) Survey could not be completed due to the location of the tanks in a wetlands area. PDS will be completed at a later date.
- (5) Survey units include both facility interior and exterior unless otherwise specified.

Note: Some survey units include Type 2 facilities, which are not addressed in this RLCR.

### 3.2.3 Sampling and Field Measurement Methods, Procedures and Equipment

Measurements were performed to evaluate the contaminants of concern in B771 (i.e., Pu-239 and Am-241 -- transuranic alpha-emitters). The TSA measurements were collected with a NE Electra using a DP-6 probe (90-second counts). Removable activity measurements were analyzed with an Eberline SAC-4 (two-minute counts). Surface scans were performed with the NE Electra at a scan rate of 1.5 inches per second. Refer to Attachment AC for *a priori* instrument MDC calculations.

Radiological survey packages were developed for each survey unit in accordance with RFETS Radiological Safety Practices (RSP) 16.01, "Radiological Survey/Sampling Package Design, Preparation, Control, Implementation and Closure," RFETS RSP 16.02, "Radiological Surveys of Surfaces and Structures," and RFETS RSP 16.05, "Radiological Survey/Sample Quality Control."

Specific TSA and removable survey locations were selected using a random number generator for all facilities. Scan locations were biased toward heavy foot-traffic areas and areas likely to collect airborne particulates. If a random location was inaccessible, the measurement was obtained as close as possible to the original location, and the new location was annotated on the survey map.

Measurement locations were clearly identified with labels or permanent markings to provide a method of referencing survey results to survey measurement locations. These measurement locations were incorporated into a grid map with a one-square meter reference coordinate system. Measurement results as well as statistical data analyses are presented in Attachments A to Z for each survey unit.

If elevated readings were observed on the metals roofs and walls of trailers, an investigation was performed to verify the presence of Po-210 versus DOE-added radioactivity. Po-210 is a radon progeny that selectively oxidizes to metal surfaces. This phenomenon has been observed on other structures at RFETS, and has been demonstrated at other nuclear facilities. The elevated roof activity was dispositioned per RFETS Technical Basis Document TBD-00156, *Using Graphical Data Distribution Analysis to Distinguish between Background and DOE-added Materials in Environmental Data Sets*, which provides a method of statistically evaluating the data collected from the affected surfaces. Twenty (20) total surface activity measurements were collected at random locations across the affected surfaces. The data was then plotted, and a statistical test performed to verify that the activity represented a single log-normal distribution with 95% confidence. If the statistical evaluation did not conclude that the elevated activity was due to a single log-normal distribution, as would be expected for natural radioactivity, then a coupon sample (2 inch diameter) was collected and analyzed to verify the presence of Po-210 and the absence of DOE-Added Radioactivity (Pu-239 and Am-241) (refer to Attachment AB for the Po-210 investigation data and coupon sample results). Technical Basis Document TBD-00153,

*Use of the OASIS for Direct Differentiation between Po-210 and DOE-added Materials*, provides a description of the OASIS system and supporting QA evaluations.

When elevated readings were observed on a porous surface (Survey Units 771020 and 771023), a concrete sample was collected and submitted to the Building 559 laboratory for isotopic analysis (for Pu-239, Pu-239/240, and Am-241).

### 3.2.4 Laboratory Analysis

Radiological coupon samples (collected from Survey Units 771011, 771016 and 771017) were analyzed using the Oxford Alpha Spectroscopy Integrated System (OASIS) (refer to Technical Basis Document TBD-00153, *Use of the OASIS for Direct Differentiation between Po-210 and DOE-added Materials*).

The coupon and concrete samples submitted to RFETS laboratories and/or approved contracted laboratories (collected from Survey Units 771019, 771020 and 771023) were analyzed via a Site-approved method (see Section 6.2.3). The laboratories have an established quality assurance/quality control program that assures the validity of the analytical results. The laboratory analytical methods used are capable of measuring levels at or below 50% of the established release criteria. All results state the detection limit for the analysis. Results are detailed in the Data Summaries (Attachments A to Z) for each individual survey unit.

### 3.3 Chemical Characterization

Chemical characterization was performed to determine the nature and extent of chemical contamination that may be present on or in the 37 facilities. Characterization was based on a review of historical and process knowledge and visual inspections, and is presented in this section. No historical data are available on these facilities. Related hazards are discussed in Section 4.0.

#### 3.3.1 Summary of Historical Information

Information on contaminants of concern (i.e., asbestos, beryllium, RCRA CERCLA constituents, lead in paint, and PCBs) is presented below.

**Asbestos:** No historical asbestos inspection data exist for any of the 37 facilities. An asbestos inspection was required for RLC.

**Beryllium:** There is no record of beryllium operations being conducted in any of the 37 facilities (refer to *D&D Facility Characterization Interview Checklist and Type I Facility Checklist for the 771 Closure Project Facilities*, and *Location of Known Beryllium Areas*). Therefore, beryllium sampling is unnecessary and was not conducted.

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**RCRA/CERCLA Constituents [including metals and volatile and semi-volatile organic compounds (VOCs & SVOCs)]:** According to historical and process knowledge, the facilities were not used for operations involving hazardous chemicals (*D&D Facility Characterization Interview Checklist and Type I Facility Checklist for the 771 Closure Project Facilities*). The trailers were used for offices, lockers, showers, break rooms, rest rooms, and guard posts. T771M is a new portable structure holding telecommunication equipment. B772 and B772 have never been put into service. B773 was a guard post, and K771N was a food service facility. B775 is a sanitary lift station. B717 was never used to store chemical samples or hazardous chemicals. B770, S770 and B771B may have been used to store hazardous chemicals (e.g., paints and thinners), but no evidence of spills was observed during facility inspections. B714A is a metal structure that was used to store HF cylinders and is now out of service. Tank 180 holds water, Tank 174 holds liquid argon, and Tanks 173, 179 and 197 hold propane. B715 and B716 contain emergency generators that hold diesel fuel. Tank 21A holds additional diesel for the generators. Tanks 192 and 193 held diesel, but they have been emptied. No releases/spills of hazardous substances are known to have occurred, and no hazardous wastes were generated or stored in these facilities. Therefore, sampling for chemical contaminants is unnecessary and was not conducted.

**Lead in paint:** No information exists on the lead content of paints on the 37 facilities. However, Environmental Waste Compliance Guidance #27, *Lead-based Paint (LBP) and Lead-based Paint Debris Disposal*, states that LBP debris generated outside of high contamination areas shall be managed as non-hazardous (solid) wastes and need not be sampled unless the potentially lead-containing component is to be scabbled or otherwise comprise a separate waste stream. Therefore, analysis for lead in paint is not required for release.

**Polychlorinated Biphenyls (PCBs):** Based on historical and process knowledge, none of the 37 facilities contained equipment that contained PCB oils. No PCBs could have been released into any of the facilities. Therefore, sampling for PCBs is unnecessary and was not conducted.

Historical data and process knowledge give no reason to suspect that any specialized paints or coatings containing PCBs were applied to any of the 37 facilities. However, Environmental Waste Compliance Guidance #25, *Management of Polychlorinated Biphenyls (PCBs) in Paint and Other Bulk Product Waste During Facility Disposition*, has directed that applied dried paints, varnishes, waxes, or other similar coatings or sealants are acceptable for disposal (with notification) in a non-hazardous solid waste landfill as PCB Bulk Product Waste under 40 CFR 761.3 and 40 CFR 761.62 paragraph (b), and therefore, need not be sampled as long as restrictions outlined in 40 CFR 761.62 regarding their disposition are met. Therefore, the facilities do not require characterization for PCBs in paint.

Some fluorescent light ballasts containing PCBs exist in some of the facilities due to their age. All PCB ballasts will be removed and segregated as a separate waste stream prior to disposition of the facilities.

### **3.3.2 Summary of RLC Data Collected**

Based on historical information presented in Section 2.0 and the inspections conducted, the only RLC chemical data collection required was sampling for asbestos-containing material. An asbestos inspection of the facilities was conducted by a CDPHE-certified asbestos inspector.

## 4.0 HAZARDS

This section presents physical, radiological and chemical hazards by facility, including data from radiological field measurements and laboratory analysis. Radiological data are presented for each survey unit in Attachments A to Z.

The RLC (serving also as the Pre-Demolition Survey, PDS) confirmed that the 771 Closure Project Type 1 Facilities (inside and outside) do not contain radiological contamination above the release limits prescribed in DOE Order 5400.5 and the RFETS Radiological Control Manual (except for the exterior of B770). The exterior survey units contained numerous total surface activity measurements above the release limits prescribed in DOE Order 5400.5 and the RFETS Radiological Control Manual. These results were suspected to be elevated due to naturally occurring radioactive material (NORM), specifically Po-210, deposited on the roof surface. OASIS results validated the presence of Po-210 and the absence of DOE-added material. Radiological hazards are summarized by facility in Table 4-1 and presented by survey unit in Table 4.2.

For each facility, the potential for a chemical hazard due to each of the following contaminants was considered:

- Asbestos.
- Beryllium;
- Lead and other metals;
- VOCs/SVOCs;
- PCBs.

Each potential chemical hazard was evaluated primarily based upon historical and process knowledge coupled with visual inspections (refer to Section 3.3). In addition, each facility was inspected for asbestos-containing material (ACM) and chemical spills, including PCB leaks from PCB light ballasts. Some samples were taken and analyzed for ACM. Chemical hazards are summarized by facility in Table 4-1 and presented by chemical in Section 4.2.

Physical hazards associated with the facilities consist of those common to standard industrial environments and include hazards associated with energized systems, utilities, compressed gas, diesel fuel, and trips and falls. There are no unique hazards associated with the different facilities. The buildings have been relatively well maintained and are in good physical condition, and therefore, do not present hazards associated with building deterioration. Physical hazards are controlled by the Site Occupational Safety and Industrial Hygiene Program, which is based on OSHA regulations, DOE orders, and standard industry practices.

**Table 4-1 Summary of Radiological and Chemical Hazards**

<b>Facilities</b>	<b>Radiological Contamination</b>	<b>Chemical Contamination</b>	<b>Asbestos Containing Material</b>
T771 A	None	None	Yes
T771 B	None	None	None
T771 C	None	None	Yes
T771 E	None	None	None
T771 F	None	None	None
T771 G	None	None	None
T771 H	None	None	None
T771 J	None	None	None
T771 K	None	None	None
T771 L	None	None	None
T771 M	None	None	None
T771 MB	None	None	None
T771 Q	None	None	None
T771 R	None	None	None
T771 T	None	None	None
T771 DT	None	None	None
T773 S	None	None	None
B714 A	None	None	None
B715	None	None	Yes
B716	None	None	None
B717	None	None	None
B770	Am-241 on exterior wall	None	None
S770	None	None	None
B771 B	None	None	Yes
K771 N	None	None	None
B772	None	None	None
B772 A	None	None	None
B773	None	None	Yes
B775	None	None	None
Tank 173	None	None	None
Tank 174	None	None	None
Tank 179	None	None	None
Tank 180	None	None	Yes
Tank 192	None	None	None
Tank 193	None	None	None
Tank 197	None	None	Yes
Tank 21A	None	None	None

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#### 4.1 Radiological Hazards

The RLC (serving also as the PDS) confirms that the B771 Cluster Outbuildings do not contain elevated activity above the release limits prescribed in DOE Order 5400.5 and the RFETS Radiological Control Manual, with the following exceptions:

**Table 4-2 B771 Type 1 RLC Summary of Observed Elevated Activity**

Survey Unit	Facility Description	Findings	Disposition	Method	Type
771010	Exterior of Trailers E, H, J, K	Elevated activity on surface (> 100 dpm/100 cm <sup>2</sup> )	Verified to be due to natural radioactivity Po-210 (refer to Attachment AB)	Log-normal distribution	1
771011	Exterior of Trailers A, B, C, G			Sample	1
771012	T771F (Roof)			Log-normal distribution	1
771013	T771L (Roof)			Log-normal distribution	1
771014	T771MB (Roof)			Log-normal distribution	1
771016	714 (Roof)			Two (2) samples – wall and roof	1
771017	715, 716, 717 (Roof)			Sample	1
771030	T771R, T771-DT (Roof)			Log-normal distribution	1
771019	B770			Elevated activity on exterior walls and roof (> 100 dpm/100 cm <sup>2</sup> )	Confirmed Am-241
771020	B773	Elevated activity on concrete roof (>100 dpm/100 cm <sup>2</sup> )	Low-levels (< 100 dpm/100 cm <sup>2</sup> ) of Pu-239 detected. Suitable for free-release.	Concrete sample	1
771023	B728 Exterior			Concrete sample	1

Refer to Attachment AB for the Po-210 investigation data.

In addition, as indicated in Section 3.0, T771Q and T771T were not characterized as part of this RLC. They were characterized as part of the Group B RLC pursuant to PDS

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requirements. Characterization results, based on historical knowledge and survey measurements, indicate that both trailers are free of interior and exterior contamination. Refer to the Group B RLCR and project file for characterization data.

## 4.2 Chemical Hazards

### 4.2.1 Asbestos

Seven of the 37 facilities contain asbestos. Facilities containing asbestos, the location of the asbestos, the type of asbestos, and the hazard are presented in Table 4-3.

**Table 4-3 Asbestos Hazards in the 771 Closure Project Type 1 Facilities**

Facility	Location	Type of Asbestos	Abatement Hazard <sup>1</sup>
B715	Vibration damper cloth	Non-friable (assumed)	Potential for damage
	Electrical arc chutes	Non-friable (assumed)	Potential for damage
	Roofing material & paint	Non-friable	Potential for damage
	Drywall, tape & joint compound	Non-friable	Potential for damage
	Exhaust flue insulation	Friable	Potential for significant damage
B773	Tar paper & fiberglass on ductwork on roof HVAC	Non-friable	Potential for damage
	Electrical wiring	Non-friable	Potential for damage
B771 B	Electrical wiring	Non-friable	Potential for damage
T771 A	Window putty	Non-friable	Potential for damage
	Black tar & green shingles	Non-friable	Potential for damage
T771 C	Vinyl flooring	Non-friable	Potential for damage
	Black tar & gray shingles	Non-friable	Potential for damage
Tank 180	Sealer/mastic on tank & valve flanges	Non-friable	Potential for damage
Tank 197	Cementitious board around the manifold station	Non-friable	Potential for damage

<sup>1</sup>Denotes the potential for ACM being damaged during abatement. If there is damage, there is an exposure potential. The greater the damage, the greater the exposure potential.

The asbestos data are contained in *Asbestos Characterization Report For The Building 771/774 Out Buildings*, which is maintained in 771 Closure Project RLC file.

### 4.2.2 Metals (including beryllium and lead in paint)

According to historical and process knowledge, no metals, including beryllium and lead, were used or stored in the facility, and therefore, no related contamination is present.

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Some paints may contain lead and other metals, however, Environmental Waste Compliance Guidance #27, *Lead-based Paint (LBP) and Lead-based Paint Debris Disposal*, states that LBP debris generated outside of high contamination areas shall be managed as non-hazardous (solid) wastes and need not be sampled unless the potentially lead-containing component is to be scabbled or otherwise comprise a separate waste stream.

#### 4.2.3 VOCs/SVOCs

According to historical and process knowledge, no chemical processes were performed in the facilities. Some chemicals were stored in some of the facilities, but no evidence of spills was observed during facility walkdowns. Therefore, no chemical contamination and related hazards are suspected.

#### 4.2.4 PCBs

Based on historical and process knowledge, none of the 37 facilities contained equipment that contained PCB oils. Therefore, no PCBs could have been released and contaminated any of the facilities. Some fluorescent light ballasts containing PCBs exist in some of the facilities, and all PCB ballasts will be removed prior to disposition of the facilities.

Historical data and process knowledge give no reason to suspect that any specialized paints or coatings containing PCBs were applied to any of the 37 facilities. However, Environmental Waste Compliance Guidance #25, *Management of Polychlorinated Biphenyls (PCBs) in Paint and Other Bulk Product Waste During Facility Disposition*, has directed that applied dried paints, varnishes, waxes, or other similar coatings or sealants are acceptable for disposal (with notification) in a non-hazardous solid waste landfill as PCB Bulk Product Waste under 40 CFR 761.3 and 40 CFR 761.62 paragraph (b), and therefore, need not be sampled as long as restrictions outlined in 40 CFR 761.62 regarding their disposition are met.

## 5.0 DECOMMISSIONING WASTE TYPES AND VOLUME ESTIMATES

The disposition of the facilities not reused will generate a variety of wastes. Table 5-1 presents the estimated volumes of potential wastes by facility and waste type. All wastes can be disposed of as sanitary waste, except asbestos containing material, PCB ballasts, and material associated with the exterior of B770. Contaminated material associated with the B770 exterior will have to be disposed of as low level radioactive, unless it is decontaminated to below release limits. There will be no hazardous waste. Asbestos and PCBs ballasts will be managed pursuant to Site asbestos abatement and waste management procedures.

**Table 5-1 Estimated Waste Volumes by Waste Type and Facility**

Facility	Concrete	Wood	Metal	Corrugated/ Sheet Metal	Wall Board	ACM	Other Waste
771-DT	None	40 cu ft	40 cu ft	25 cu ft	300 cu ft	None	300 cu ft insulaton
T771A	None	200 cu ft	1,000 cu ft	500 cu ft	200 cu ft	10 sq ft window putty 40 sq ft tar & shingles	500 cu ft insulation
T771B	None	200 cu ft	200 cu ft	100 cu ft	200 cu ft	None	500 cu ft insulation
T771C	None	50 cu ft	100 cu ft	50 cu ft	75 cu ft	800 sq ft vinyl flooring 120 sq ft tar & shingles	250 cu ft insulation
T771E	None	300 cu ft	200 cu ft	50 cu ft	200 cu ft	None	500 cu ft insulation
T771F	None	100 cu ft	200 cu ft	100 cu ft	200 cu ft	None	500 cu ft insulation
T771G	None	50 cu ft	100 cu ft	50 cu ft	80 cu ft	None	250 cu ft insulation
T771H	None	300 cu ft	200 cu ft	50 cu ft	200 cu ft	None	500 cu ft insulation
T771J	None	200 cu ft	200 cu ft	100 cu ft	200 cu ft	None	500 cu ft insulation
T771K	None	200 cu ft	200 cu ft	100 cu ft	200 cu ft	None	500 cu ft insulation
T771Q	None	200 cu ft	200 cu ft	100 cu ft	200 cu ft	None	500 cu ft insulation
T771R	None	200 cu ft	200 cu ft	100 cu ft	200 cu ft	None	500 cu ft insulation
T771MB	None	150 cu ft	50 cu ft	100 cu ft	100 cu ft	None	200 cu ft insulation
T771L	None	100 cu ft	50 cu ft	50 cu ft	100 cu ft	None	150 cu ft insulation
T771M	7 cu ft	10 cu ft	10 cu ft	2 cu ft	150 cu ft	None	None
T771T	None	75 cu ft	100 cu ft	50 cu ft	100 cu ft	None	150 cu ft Insulation
T773S	None	300 cu ft	None	25 cu ft	50 cu ft	None	100 cu ft insulation
B714A	None	None	50 cu ft	25 cu ft	None	None	None
B715	1,500 cu ft	None	100 cu ft	50 cu ft	None	Vibration damper cloth Arc chutes 900 sq ft roofing material 120 sq ft flue insulation	None
B716	None	None	160 cu ft	180 cu ft	None	None	None
B717	None	None	2 cu ft	10 cu ft	None	None	None
B770	None	None	1,000 cu ft	2,000 cu ft	None	None	500 cu ft insulation
B772	1,500 cu ft	None	250 cu ft	None	None	None	None
B772A	None	None	150 cu ft	None	None	None	None
B773	500 cu ft	None	None	None	None	250 sq ft tar paper & fiberglass insulation Electrical wiring	None

<b>B775</b>	150 cu ft	None	None	None	None	None	None
<b>S770</b>	None	50 cu ft	None	5 cu ft	None	None	None
<b>B771B</b>	None	200 cu ft	None	10 cu ft	None	Electrical wiring	None
<b>K771N</b>	None	100 cu ft	50 cu ft	25 cu ft	None	None	150 cu ft insulation
<b>Tank 173</b>	None	None	N/A	None	None	None	None
<b>Tank 179</b>	None	None	N/A	None	None	None	None
<b>Tank 197</b>	None	None	N/A	None	None	150 sq ft cementitious board	None
<b>Tank 174</b>	None	None	N/A	None	None	None	None
<b>Tank 180</b>	None	None	5 cu ft	None	None	4 sq ft sealer/mastic	10 cu ft insulation
<b>Tank 192</b>	None	None	60 cu ft	None	None	None	None
<b>Tank 193</b>	None	None	60 cu ft	None	None	None	None
<b>Tank 21A</b>	None	None	N/A	None	None	None	None

N/A - not applicable; tanks will be returned to product vendor.

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## 6.0 DATA QUALITY ASSESSMENT (DQA)

### 6.1 Introduction

Data used in making management decisions for decommissioning and waste management must be of adequate quality to support the decisions. Adequate data quality for decision-making is required by applicable K-H corporate policies (K-H, 1997, §7.1.4 and 7.2.2), as well as by the customer (DOE, RFFO; Order O 414.1, Quality Assurance, §4.b.(2)(b)). Regulators and the public also expect decisions and data that are technically and legally defensible. Verification and validation of the data ensure that data used in decisions resulting from the Pre-Demolition Survey (PDS) are usable and defensible.

Verification and validation (V&V) of this RLCR are the primary components of the DQA. V&V constitutes the cornerstone of the DQA, because statistical tests and material background determinations relative to decision-making for radiological survey units were not implemented nor required. Instead, measurement results were compared, on a one-to-one basis, with release criteria given in DOE Order 5400.5. The PDS results could, theoretically, be used to conduct Sign Tests for decisions, but because all individual measurements were less than the DCGL<sub>w</sub> (excluding confirmed NORM values), the survey units meet release criteria without further data reduction. This DQA supports conclusions in the report through implementation of the guidelines taken from the following MARSSIM sections:

- §4.9, Quality Control
- §8.2, Data Quality Assessment
- §9.0, Quality Assurance & Quality Control
- Appendix E, Assessment Phase of the Data Life Cycle
- Appendix N, Data Validation using Data Descriptors

DQA was performed on measurement and sample results obtained from the Survey Units listed Table 3-1. These Survey Units are traceable to specific building locations.

### 6.2 Verification of Results

Verification ensures that data produced and used by the project are documented and traceable per quality requirements. Verification consisted of reviewing the project's data relative to three subsets:

1. Radiological scans;
2. Static surveys for removable and total contamination; and
3. Radiochemical data resulting from samples taken and subsequently analyzed via alpha spectrometry.

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Consistent with similar PDS reports at the RFETS, verification will confirm the following:

- Chain-of-Custody was intact from initial sampling through transport and final analysis;
- Preservation and hold-times were within tolerance; and
- Format and content of the data are clearly presented relative to goals of the project (i.e., to determine, with at least 95% confidence, that the survey units of interest are adequate for unrestricted radiological release).

Verification of the PDS data will also address quality records representing implementation of the following quality controls:

- Calibrations (radiochemistry & surveys), for accuracy;
- Laboratory control samples (LCS -- radiochemistry), for accuracy;
- Blanks (radiochemistry), for accuracy;
- Duplicate measurements (radiochemistry & surveys), for precision;
- Chemical yield (radiochemistry), for accuracy;
- Count times (radiochemistry & surveys), for sensitivity; and
- Sample preparations (radiochemistry), for accuracy, representativeness.

All radiological data are organized into Survey Packages, which correlate to unique (MARSSIM) Survey Units. Each Survey Package is systematically reviewed by the responsible Radiological Engineer, a peer reviewer, and finally, Radiological Engineering Management.

All relevant Quality records associated with the PDS decisions will be submitted to the CERCLA Administrative Record for permanent storage within 30 days of the completion of this RLC.

### **6.3 Validation Of Results**

Validation consists of a technical review of all data that directly support the PDS decisions, so that any limitations of the data relative to project goals are delineated, and the associated data are qualified (caveated) accordingly. Data were validated relative to the following:

1. The DQOs of the project as defined in Section 3.1 (i.e., did the final data achieve the initial DQOs of the project?); and
2. Quality criteria discussed throughout various sections in the MARSSIM (sections noted previously).

MARSSIM criteria for the broad topic of "data quality assessment" used in final status surveys generally falls within the generic categories of quality assurance, quality control, data validation, and data assessment (including verification and validation). Table 6-1

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provides a “crosswalk” that lists the primary MARSSIM sections and generic data quality criteria (at top) and their corresponding implementation via the RLCR and project files.

All of the significant MARSSIM criteria listed in Table 6-1 are summarily addressed within the “PARCC Parameters” discussion presented below. PARCC parameters are congruent with “data descriptors” in the MARSSIM parlance and address characteristics of the data that must be defined for scientific integrity and defensibility. Recall that at least one “X” in each column of the table constitutes achievement of the MARSSIM quality objective (vs. one “X” in each row). The following discussion of the PARCC parameters -- Precision, Accuracy, Representativeness, Comparability, and Completeness, also include discussion of bias and sensitivity, two more data descriptors emphasized in MARSSIM.

## **PARCC PARAMETERS**

### **Precision**

#### 1) Radiological Surveys

Duplicate measurements were periodically acquired ( $\geq 5\%$  frequency of real surveys) on the MARSSIM survey grids. All duplicate measurements were within tolerance based on the acceptance criterion that both results be below  $DCGL_w$ . The only exception occurred where punctures of the mylar sheets (within the probe face) were noted for limited QC measurements. Given the descriptive statistics of the Survey Unit, which exhibit maximum and mean values well below the  $DCGL_w$ , as well as a relatively low standard deviation, repeatability of measurements within the unit is well defined, and missing QC measurements do not suggest a compromise in measurement repeatability within the unit.

#### 2) Radiochemistry

Results from laboratory duplicates, analyzed via standard alpha spectroscopy, indicate adequate reproducibility based on duplicate results within statistical tolerance values ( $>90\%$  confidence of equivalency between the original sample and the duplicate).

### **Accuracy (And Bias)**

#### 1) Radiological Surveys

Accuracy of radiological surveys is satisfactory based on RFETS-programmatic annual calibrations that establish instrument efficiencies and sensitivities for all instrumentation used on this project. Daily source checks also provided periodic checks to ensure that all sensors are within tolerance during daily operations. Calibration and calibration check results were within the RFETS and industry-standard requirement of 20% of the applicable reference standard values. Full-scale multi-point calibrations provided

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accuracies of  $\pm 10\%$  prior to implementation of survey instruments in the field, consistent with guidelines put forth in ANSI-N323.d

Distance measurements recorded on maps are within 3% of actual distances based on the laser technology used for distance measurements associated with the surveys.

Key work-controlling procedures that contributed to accuracy (and representativeness) of the radiological surveys consisted of the following:

- Kaiser-Hill, LLC., 1999. *Radiological Safety Practices*. RFETS, Golden, CO
- Kaiser-Hill, LLC., 2000. *Use of the OASIS for Direct Differentiation between Po-210 and DOE-added Materials*, Technical Basis Document (TBD) – 00153.

Biases were not evaluated for specific instrumentation, as instruments were not dedicated to the project, but were rather acquired from a general pool of instruments available to the Building 771 complex as a whole. Limited tolerance charting of a number of instruments used on the project exhibited no bias over time. However, for all survey measurements acquired, pre-measurement and post-measurement performance checks were performed, and all readings were in tolerance.

## 2) Radiochemistry

Accuracies of the OASIS alpha spectroscopy results were acceptable based on establishing a batch-specific efficiency for the system and measurement of reference standards within control limits ( $^{237}\text{Np}$ , as established by  $\pm 3$  sigma bounds about the arithmetic mean).

Use of the on-site OASIS consisted of 2 parts: 1) establishing presence/absence of DOE-added radionuclides at the sensitivities specified for the OASIS (i.e.,  $\leq 50\%$   $\text{DCGL}_w$ ), and 2) quantification of Po-210 concentrations relative to levels measured in the field with hand-held instruments.

Background values were approximately 1.2 dpm/100  $\text{cm}^2$  for the sample batches, which is typical for the OASIS. Background values approaching 2 dpm/100  $\text{cm}^2$  require corrective actions to the OASIS protocol, but this upper limit was not approached during analysis of the samples.

Because no radiochemical results exceeded action levels, evaluation of preparation blank data was not required.

Verification and validation of sample result accuracies from the on-site B559 laboratory were adequate based on satisfactory percent (tracer) yields and LCS recoveries between 75% and 125%. Random (counting) error was quantified as  $\pm 2$  sigma; total error was not quantified. Preparation blanks also confirmed that no significant cross-contamination occurred in the analysis process. These results, from two samples,

confirmed that no transuranics were present at the locations where elevated survey readings were acquired.

### **Representativeness**

Samples and surveys are representative based on the following criteria:

- Familiarity with facilities -- multiple walk-downs and collaborations by management and technical staff;
- Implementation of industry-standard Chain-of-Custody protocols;
- Compliance with sample preservation and hold times; and
- Documented and (site) approved methods.

All survey measurements in excess of the DCGLw resulted from random TSA measurements from exterior roofing surfaces (all sheet metal with the exception of one concrete surface). These elevated readings represent a consistent phenomena across the RFETS, where Po-210 (NORM) has effectively deposited as a fixed radioactive material. All graphical representations of the sheet metal data, as well as radiochemical analysis of suspect samples, have further corroborated this phenomena for the Type 1 facilities within the 771 Complex. The elevated alpha activity associated with the concrete sample was verified as not being DOE-added material.

### **Completeness**

Building Survey Units are complete with respect to the required content and appropriate reviews/approvals (management, technical, and QA). All radiological Survey Packages for Type 1 facilities in the 771 Complex are complete, with the exception of those listed below.

- 771026 – ceiling areas inaccessible until equipment strip-out
- 771027 - ceiling areas inaccessible until equipment strip-out
- 771018 – standing water on the floor prevents alpha surveys
- 771024 - access problems due to Wetlands restrictions
- 771025 - access problems due to Wetlands restrictions

However, the existing data collected for the survey units listed above are complete and indicate that Type 1 classification is appropriate for the facilities in question.

Consistent with EPA's G-4 DQO process, the radiological survey design was optimized by checking actual measurement results (acquired during final status survey) against model output with original estimates. Use of actual sample/survey (result) variances in MARSSIM's DQO model confirms that an adequate number of samples/surveys were acquired. All radiological results are valid without qualification, and form data sets with adequate quantities and quality of data for release decisions.

No beta/gamma survey designs were implemented for the 771 facilities based on the conservatism of the transuranic limits used as DCGLs in the unrestricted release decision process. Stated differently, based on the well-established suite of actinides historically used at the RFETS, all of these actinides would emit alpha radiation in exceedance of the applicable transuranic DCGLs before other DCGLs would be exceeded for their respective Uranium species – the Building 371 Technical Position Paper, *Basis for Performing Solely Alpha Contamination Surveys for Building 371/374*, corroborates the use of this conservative approach.

## Comparability

All results presented are comparable with radiological survey and radiochemistry data on a site- and DOE-complex wide basis. This comparability is based on:

- Use of standardized engineering units in the reporting of measurement results;
- Consistent sensitivities of measurements at  $\leq 50\%$  DCGL<sub>W</sub> ( $\leq 50\%$  DCGL<sub>EMC</sub> for scans);
- Use of site-approved procedures (RSPs and TBDs);
- Systematic quality controls; and
- Thorough documentation of the planning, sampling/analysis process, and data reduction into formats designed for making decisions posed from the project's original data quality objectives.

One aspect of comparability recently added to the PDS repertoire is a graphical method and screening tool to differentiate NORM (specifically Po-210) from DOE-added radionuclides. This technique relies on a graphical comparison of point-clustering as depicted on a log-normal frequency distribution. The graphical technique was used in several instances for this project; details of the methodology are given in the RFETS Technical Basis Document (TBD) – 00156, *Using Graphical Data Distribution Analysis to Distinguish between Background and DOE-added Materials in Environmental Data Sets*. Generally stated, if the said graphical displays of data (typically at least 30 data points representing TSA values) suggest more than one population of radionuclides present (e.g., NORM vs. transuranics), additional samples must be taken to positively identify and quantify the unknown radionuclides. Attachment AB presents the results of these graphical results for the Type 1 Facilities of interest for the 771 Complex.

## Sensitivity

Adequate sensitivities, in units of dpm/100<sup>2</sup> cm, were attained for all surveys and radiochemical methods implemented based on MDAs at 50% of the transuranic DCGL<sub>W</sub> ( $\leq 50\%$  DCGL<sub>EMC</sub> for scans). Derivations of MDAs are given in Attachment AC for the Electras and the OASIS; MDAs for removable contamination measurements are derived from 3-PRO-112-RSP-02.01, *Radiological Instrumentation*. The nominal MDAs for each survey and radiochemical method are summarized as follows:

- Surveys (Eberline SAC-4) - removable contamination: 10 dpm/100cm<sup>2</sup>
- Surveys (NE Electra) - total surface contamination (TSA): 50 dpm/100cm<sup>2</sup>
- Surveys (NE Electra) – scans: <126 dpm/100 cm<sup>2</sup>
- Radiochemistry (standard alpha spec) - transuranic contamination: <10 dpm/100cm<sup>2</sup>
- Radiochemistry (OASIS) - transuranic contamination: <50 dpm/100cm<sup>2</sup>

### **Summary**

In summary, the data presented in this report have been verified and are qualified as valid and complete for comparison with release criteria (action levels) as stated in the original DQOs. All media sampled and surveyed, relative to both total and removable alpha activities, yielded results less than action levels for the associated contaminants of concern. Therefore, the Survey Units in question meet the free-release criteria with the confidences stated in this section and throughout the report.

## 7.0 CLASSIFICATION OF TRAILERS

Based on the analysis of radiological, chemical and physical hazards, the 37 facilities were classified pursuant to the RFETS Decommissioning Program Plan (DPP, K-H, 1999). Classification was based on a review of historical and process knowledge, and newly acquired RLC data, and will be subject to concurrence by the Colorado Department of Public Health and the Environment. DPP classification criteria are defined as follows:

- **Type 1** facilities are considered “free of contamination”.
- **Type 2** facilities contain no significant contamination or hazards, but are in need of decontamination. The extent of contamination is such that routine methods of decontamination should suffice and only a moderate potential exists for environmental releases during decommissioning.
- **Type 3** facilities contain significant contamination and/or hazards.

Thirty-six (36) of the 37 facilities (T771 A – C, E – H, J – M, Q, R, T, DT & MB, and T773 S; B714A, B715 – B717, B772, B772A, B773, B775, S770, B771B and B771K; and Tank 21A, 173, 174, 179, 180, 192, 193 and 197) are classified as Type 1 facilities. These facilities are not contaminated, and present no radiological or physical hazards. Some contain asbestos (i.e., B715, B771B, B773, T771A, T771C, Tank 180, and the Tank 197 manifold station) and PCB ballasts. However, the presence of asbestos and PCB fluorescent light ballasts does not make a facility a Type 2 as long as asbestos and ballasts are removed pursuant to Site asbestos abatement and waste management procedures.

One of the facilities, B770, is classified as a Type 2 facility because of radioactivity detected on the exterior of the building (Am-241). No other contamination or hazards were identified on or in the building.

To ensure that the Type 1 facilities remain free of contamination and that Pre-Demolition Survey data remain valid, isolation controls will be established, and the facilities will be posted accordingly.

## 8.0 REFERENCES

ANSI-N323A-1997, *Radiation Protection Instrumentation Test and Calibration*.

DOE/RFFO, CDPHE, EPA, 1996. Rocky Flats Cleanup Agreement (RFCA), July 19, 1996.

DOE Order 5400.5, "Radiation Protection of the Public and the Environment."

DOE Order 414.1A, "Quality Assurance."

EPA, 1994. "The Data Quality Objective Process," EPA QA/G-4.

K-H, 1997. "Kaiser-Hill Team Quality Assurance Program", Rev. 5, December, 1997.

K-H, 1998. Facility Disposition Program Manual, MAN-076-FDPM, Rev. 1, September 1999.

K-H, 1999. Decontamination and Decommissioning Characterization Protocol, MAN-077-DDCP, Rev. 1, June 19, 2000.

K-H, 1999. Decommissioning Program Plan, June 21, 1999.

K-H, 2000. Pre-Demolition Survey Plan, MAN-127-PDSP, Rev. 0, October 3, 2000.

MARSSIM – Multi-Agency Radiation Survey and Site Investigation Manual, December 1997 (NUREG-1575, EPA 402-R-97-016).

RFETS, Environmental Waste Compliance Guidance #25, *Management of Polychlorinated Biphenyls (PCBs) in Paint and Other Bulk Product Waste During Facility Disposition*.

RFETS, Environmental Waste Compliance Guidance #27, *Lead-Based Paint (LBP) and Lead-Based Paint Debris Disposal*.