

**OFFICE OF ENVIRONMENTAL RESTORATION  
SOUTHWESTERN AREA PROGRAMS, EM-45**



**PAGES: 4**  
**(including cover)**

**DATE: 11 FEB 97**

**TO: John Whiting, K-H & Melody Bell, RFFO**  
**FAX #: 303-966-3090 & 303-966-????**

**FROM: Jeff Ciocco, EM-45**

**Phone: 301-903-7459**  
**Fax: 301-903-3877**

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**SUBJECT:**

**Bldg 779 DOP Comments**

*It would also be helpful to distribute all comments received to the members of the Facilities Disposition Working Group, etc.*



## MEMORANDUM

February 11, 1997

From: [REDACTED]  
To: RFFO, Melody Bell  
K-H, John Whiting

Subject: REVIEW OF ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE  
DRAFT DECOMMISSIONING OPERATIONS PLAN (DOP) FOR THE  
BUILDING 779 COMPLEX, DATED [REDACTED]

A programmatic review was conducted on the subject document. The review centered around conformance to the *Rocky Flats Cleanup Agreement* (RFCA) and Environmental Management's *Decommissioning Resource Manual*; and adherence to general decommissioning documentation best practices.

In general, comments are of a nature, that require resolution. The document is not of a quality to be put forth for public comment. Of significance, the document does not address the following points (1) deactivation end-points-- how they relate to the decommissioning process; (2) a hierarchy of decommissioning documents; (3) a summary of alternatives and selection of the preferred alternative; or (4) initial technical, cost, and schedule baselines. Most of these elements would normally be addressed within a Decommissioning Project Plan, however, it is not evident whether this type of plan will be prepared for decommissioning at Rocky Flats Environmental Technology Site.

General Comments:

- 5 - • Include a discussion on deactivation end-points, and the transition process (EM-60 to EM-40 including documentation needed for acceptance.)
- 6 - • Include a document hierarchy (Decommissioning Program Plan (DPP), DOP, Integrated Work Control Packages (IWCP), Decommissioning Project Plan, etc.).
- 7 - • Include cost, schedule, and work breakdown structure information.
- 8 - • Include summary of proposed alternatives and recommended selection (Satisfy CERCLA Engineering Evaluation/Cost Assessment requirement.)
- 9 - • Prepare one page "Fact Sheet" that details contents of the Decommissioning Operations Plan (DOP) to accompany the DOP when the draft is submitted to Regulators.
- 10 - • Develop an informational training "Workshop" to educate "stakeholders" and Regulators to the working of the decommissioning process at the Rocky Flats Environmental Technology Site, perhaps as part of the public meeting process.
- 11 - • Run spell check, and format check.

Specific Comments:

| ID # | LOCATION<br>(Pg./Sect./Para.)    | COMMENT   |
|------|----------------------------------|---|
| 1    | 2/Table of Contents              | Revise table of contents to reflect actual contents of the document.  |
| 2    | 5/1.1/1st                        | Change "CERCLA interim status removal process" to <b>CERCLA non-time critical removal action.</b>   |
| 3    | 5/1.1/1st                        | What other decommissioning documents will be prepared. (e.g., Decommissioning Project Plan, Work Authorization Document, Integrated Work Control Packages, etc.)  |
| 4    | 5/1.2.1/2nd                      | If this document provides only administrative structure, will a Decommissioning Project Plan be written to establish the initial technical, schedule, and cost baselines for the project?                               |
| 5    | 6/1.2.1/3rd                      | The Section 5 description is unclear as written.  |
| 6    | 20/3.1.2/1st                     | Add a statement indicating that all rooms in Bldg. 779 are potentially radiologically contaminated and may have been used to store or use RCRA hazardous materials.   |
| 7    | 20/3.1.2                         | Reference Appendix 3 for Radiological Contamination information.  |
| 8    | 21 thru 40/3.1.2.1 thru 3.1.2.60 | Ensure that each room identified has a statement indicating its radiological or hazardous materials condition. (Good example- Pg. 31/3.1.2.31) Adding the statement recommended by comment #6 may eliminate this need.) |
| 9    | 40/3.2.1/3rd                     | "As discussed later..." Indicate in what section of the document.   |
| 10   | 43/3.2.3/2nd                     | Remove Appendix 2. Reference the Decommissioning Handbook.  |
| 11   | 44/3.2.4/last                    | Reference is made to "attached schedule." Is the schedule an Appendix?  |
| 12   | 48/4.3, 4.4, and 4.5             | Reference Appendix 3.   |
| 13   | 53/6.2/last                      | Consider using a Basis for Interim Operations (BIO) concept to document safety authorization basis during deactivation and decommissioning.   |
| 14   | 64/8.2/                          | Change "PUD" to <b>PU&amp;D.</b>  |
| 15   | 71/9.0                           | Include a general statement that Rocky Flats was placed on the NPL in 1989.   |

| ID | LOCATION<br>(Page/Para)         | COMMENT  |
|----|---------------------------------|--|
| 16 | 77/9.6                          | Explain or reword the sentence "Remediation of the destruction of the building is required."   |
| 17 | 90/10.4                         | Reference the Decommissioning Resource Manual and all other references used in the document. Change the location of "References" to the last section or an Appendix. |
| 18 | 128/1.0/1st                     | Remove the sentences dealing with the Large Scale Demonstration Project due to the recent RFETS decision on its cancellation, unless that has changed.               |
| 19 | 151/Work<br>Description/Remarks | Describe/explain "Standard Work Practice", perhaps in the glossary.  |

*Jeff Crocco*

DOE IH  
1/6/97 revision

# REVIEW COMMENT SHEET

Time Spent on Review: \_\_\_\_\_ hrs.  
Return to: MARK HICKMAN  
Name: \_\_\_\_\_  
Ext: 7145 Location: 1130F  
FAX: \_\_\_\_\_

If questions on content, please call the SME:  
[Redacted]

Ext: 6560 Page: 1 of 1

Please review the attached procedure:

Comment Due Date: 1/9/97 Number: \_\_\_\_\_  
 Internal Review  Parallel Review  Verification  Validation  Draft  Revalidation  
Name: DECOMMISSIONING OPERATIONS PLAN (DOP) FOR THE BUILDING 779 COMPLEX

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.

| TYPE<br>G or M | PAGE<br>OR LINE # | SECTION | COMMENT  | Disposition<br>Accepted<br>INIT/DATE |
|----------------|-------------------|---------|--|--------------------------------------|
| G              | 59                | 7.1.5   | Are JSAs performed by Occ. safety and/or Industrial Hygiene? | DISPOSITION                          |

POC/Reviewer: (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)  
 No Comments  
 This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur.

Signature: [Signature] Name: \_\_\_\_\_  
Ext./Pager/Fax: 5458/4584 Bldg./Organization: 460 DOE/HSD

Date: 1/17/97

Concurrence: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

**Review Comment Sheet**

**Section 1: DESIGN PACKAGE AND REVIEWER IDENTIFICATION**

1. IWC/Authorization Project Number **KTBC3200** 2. Reviewer's Name (Print) **John Miller** 3. Organization **Rad. Eng.** 4. Location **T690B** 5. Phone No. **2454** 6. Pager No. **7981** 7. Page **1 of 1**

8. Type of Review  Design Check  Interdiscipline Review  Other (specify):

9. Due Date **5/15/97**

**Section 2: REVIEW COMMENTS AND DISPOSITION**

| 10. No. | 11. Reference: Page, Para, Dwg #, etc. | 12. Comments: Provide comment and proposed resolution  | 13. Accept/Reject                   | 14. Proposed Comment/Disposition                | 15. Date Comment Closed |
|---------|--|--|-------------------------------------|---|-------------------------|
| 1       | 2.1.2, Page 7                          | RPOSO -> who is this, what level of Mgmt and how will ART, GSY of RFETS ACM affect this position?  | <input checked="" type="checkbox"/> | This individual will be assigned to the Project |                         |
| 2       | 8.2, Page 58                           | Last sentence in Section 8.1 carried over as first sentence of Section 8.2   | <input type="checkbox"/>            |   |                         |
| 3       | A1.2.21.1, Page A-29                   | Delete "alpha radiation survey" replace with "neutron radiation survey"  | <input type="checkbox"/>            | Incorporated                                    |                         |
| 4       | General                                | Since T79 was handled by and U, has it been determined that Pu contamination/Airborne limits will be applied for all activities OR will alpha spectroscopy be performed to identify between isotopes so that the higher U limits can be applied when applicable. | <input checked="" type="checkbox"/> | Yes   |                         |

15.  No Comments  No impact or relevance to discipline or organization

**FULL CONCURRENCE:** I have reviewed the document referenced above from my organization's discipline-specific point of view and concur fully with its implementation. All comments and concerns have been resolved to my satisfaction.

18. **FINAL COMMENT DISPOSITION:** I have made final disposition for all comments not resolved to the satisfaction of the reviewer. Technical justification for the disposition of these comments is attached.

19. Responsible Manager - Name (Print)

16. Reviewer - Signature

17. Date

20. Responsible Manager - Signature

21. Date