

STATE OF COLORADO

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

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

March 19, 2001

Mr. Joseph A. Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Southside D&D and RFCA Industrial Facility Disposition Process Flow Chart

Dear Mr. Legare:

Thank you for your letter dated March 5, 2001, which was provided in response to our letter of December 13, 2000 and our meeting of January 22, 2001 concerning Southside D&D issues. During our review of this letter and the information provided, we identified a concern with the RFCA Industrial Facility Disposition Process flow chart that was attached to your letter.

The issue revolves around the removal process for fixed equipment. As defined in the DPP Section 1.1.5, and as discussed at the January 22nd meeting, the building decommissioning activity of removing fixed equipment that is not attached to building systems may occur without the creation of specific RFCA decision documents as long as the consultative process between the regulator and the site has taken place prior to removal. The DPP also permits that "on a case by case basis, fixed equipment that is connected to building systems may be removed..., with the agreement of the parties." It was agreed at the meeting on January 22nd that this type of agreement is to be recorded and included in the administrative record for the building.

Due to the distinction in the DPP between fixed equipment not attached to building systems and equipment that is attached to these systems, we request that the Industrial Facility Disposition Process Flow Chart be modified to reflect that distinction. We request that the "Property and Fixed Equipment Removal" phase of decommissioning on the shaded left side of the flow chart be modified to specify that this is referring to equipment that is not attached to building systems. The "Component Removal" phase of decommissioning should be modified to include fixed equipment attached to building systems.

1/2
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ADMIN RECORD

IA-A-000750

With respect to any removal of fixed equipment, including equipment that is not attached to a building system, we emphasize that any D&D work must be done with timely and sufficient consultation with the regulator in advance of work being conducted. There are situations where the regulator might have concerns with some equipment removals. A recent example from the Southside is the proposed removal of equipment that is fixed to metal floors in rooms in Building 881. To our knowledge, no one knows why metal floors were put in these rooms. It is possible that the floors were covered due to contamination concerns. Our technical person assigned to Building 881, David Kruchek, raised concerns that removal of the fixed equipment from these rooms may create openings in the metal floor, possibly exposing contamination. Due to this concern, the site is preparing an IWCP that addresses the potential contamination issues and requires the covering of holes in the metal floor that are exposed when equipment is removed.

If we believe that the consultative process is not being adequately followed, either for Southside D&D or for other projects, we will quickly raise our concerns to you and request that they be addressed.

If you have any questions regarding this correspondence please contact me at (303) 692-3367.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, CTG, RFFO
Fred Gerdeman, FC, RFFO
Tim Rehder, EPA
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Administrative Records, Building 850