



Department of Energy

ROCKY FLATS OFFICE
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Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8 WM-C
Denver, Colorado 80202-2405

91-DOE-7494

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Gentlemen:

We are requesting a schedule extension for the Operable Unit 2 Surface Water Interim Measure/Interim Remedial Action (IM/IRA) in South Walnut Creek pursuant to Part 42 of the Environmental Restoration Federal Facility Compliance Agreement, known as the Interagency Agreement (IAG).

Specifically, we are requesting that the IAG Table 6 milestone dates of September 30, 1991 for "Complete IM/IRA Construction" and October 30, 1991 for "Begin IM/IRA Field Treatability Testing (entire system)" be extended to September 24 and September 25, 1992 respectively. In addition to these milestones, we are also requesting modification to the milestones for the Draft and Final Treatability Test Reports to include results of testing the activated carbon units only. A Draft and Final Treatability Test Report would be prepared for submission for testing the chemical treatment/cross-flow filtration unit, October 15, 1993, and December 17, 1993, respectively.

The delay in meeting these milestones is primarily due to procurement delays. The scope of work for the project and supporting EG&G departments were identified in August 1990. A design/engineering contractor (UE&C Stearns Roger) was selected in May 1991 to provide process specifications specific to the contamination for this IM/IRA. Based on these timeframes, EG&G estimates September 25, 1992, for startup of the chemical treatment/cross-flow filtration unit. A detailed schedule for the process is attached (note that this schedule begins with the start of activities of the design/engineering contractor).

In an attempt to acquire a treatment system in a more timely manner, negotiations with DOE-Albuquerque Operations Office were initiated in April of this year. A treatment unit that has been used in the Uranium Mill Tailings Remedial Action (UMTRA) program for processing radionuclide contaminated water was identified as being potentially available for transfer to us. It was hoped that acquisition of this unit might have made it possible to meet the Table 6 milestones. However, in the last week, several issues were identified that would also delay acquisition and installation of

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this system. These issues include: (1) Design modifications for a sludge press and secondary fluid containment. (2) Potential decontamination problems. This unit contains uranium/daughter contamination that can meet release to unrestricted use requirements but once at Rocky Flats would need to meet the much more stringent transuranic contamination requirements. (3) Because of the potential contamination problems, the unit would likely be considered a Radiation Control Area that would require significantly enhanced health and safety considerations and subsequent higher operating costs. (4) There are concerns that the residual radionuclide contamination would possibly transfer to the treatment effluent, making the effluent radionuclide concentrations higher than the influent. This unit processed water with uranium concentrations in excess of 100 milligrams per liter (greater than 67,7000 picoCuries per liter; pCi/l) and treated to below 0.04 mg/l (27 pCi/l). We are most concerned with this issue as it would make attainment of gross beta ARAR of 5 pCi/g questionable. We expect that the UMTRA unit could be obtained and modified for use in the May to June 1992 timeframe. While this provides an earlier schedule, there are several risks that may make this avenue inappropriate as discussed above.

In summary, we are requesting the following changes to Table 6:

Submit Draft Treatability Test Report (Carbon System)	April 1, 1992
Submit Final Treatability Test Report (Carbon System)	June 2, 1992
Complete IM/IRA Construction	September 24, 1992
Begin Field Treatability Testing (cross-flow Filtration System)	September 25, 1992
Submit Draft Treatability Test Report (cross-flow Filtration System)	October 15, 1993
Submit Final Treatability Test Report (cross-flow Filtration System)	December 17 1993

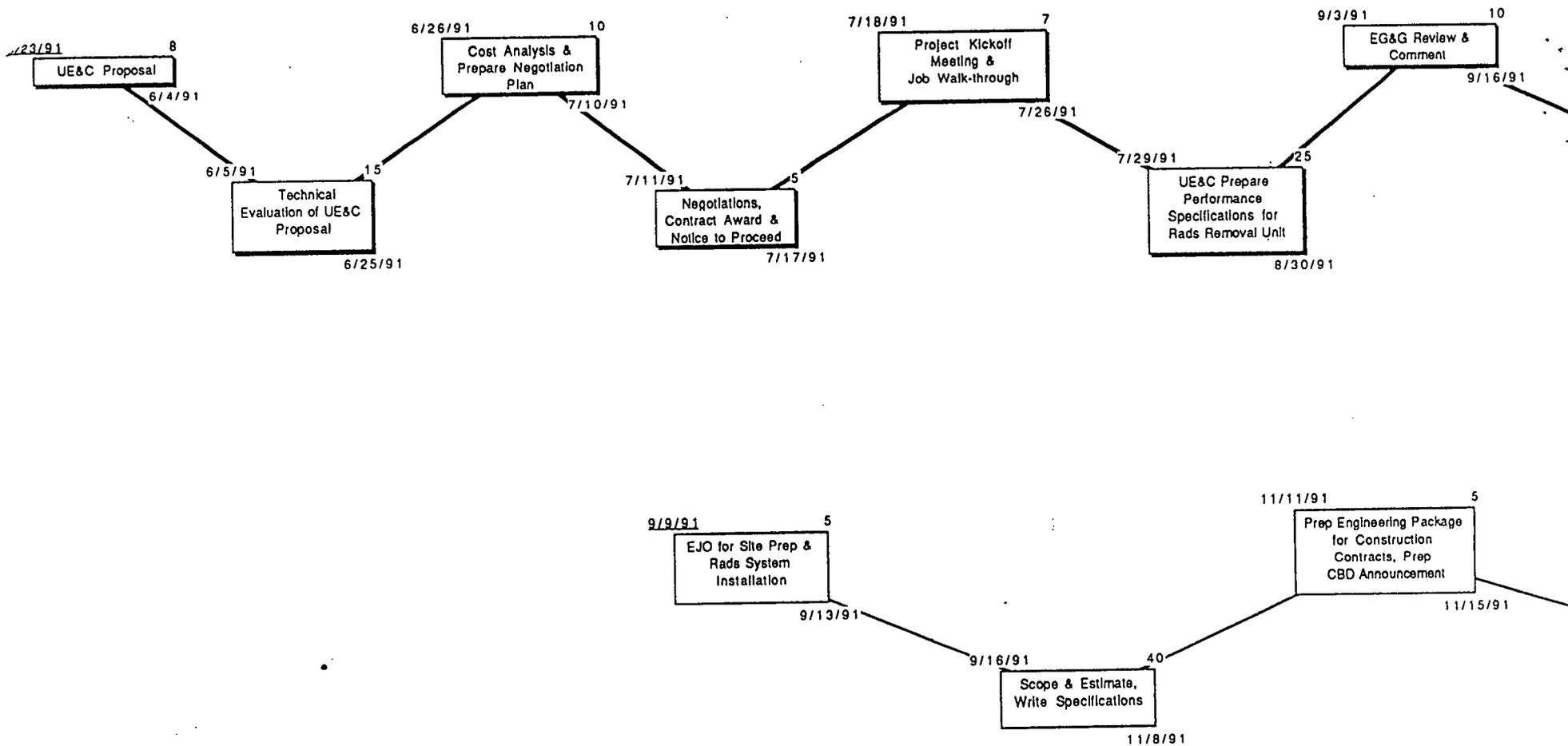
Should you have any questions, please feel free to contact Scott Grace of my staff at 966-7199.

Sincerely,


David P. Simonson
Assistant Manager
for Environmental Management

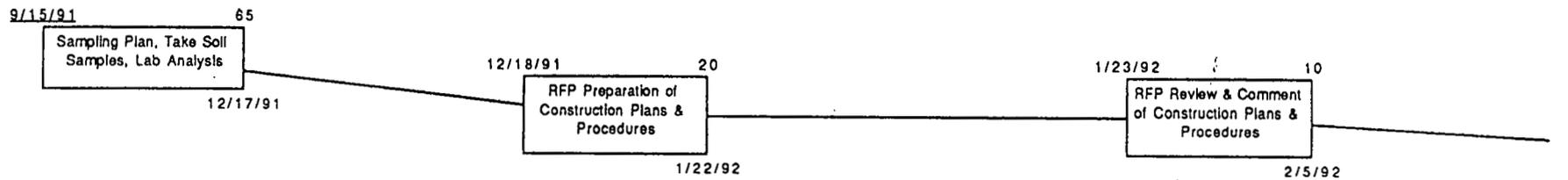
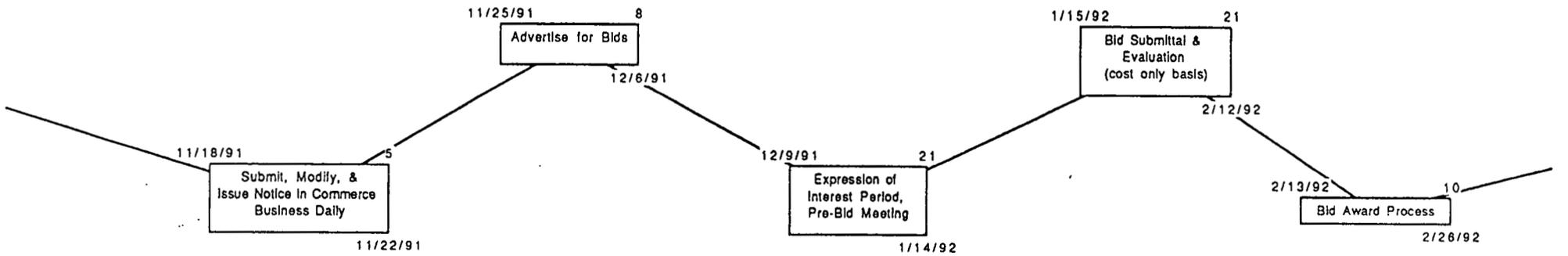
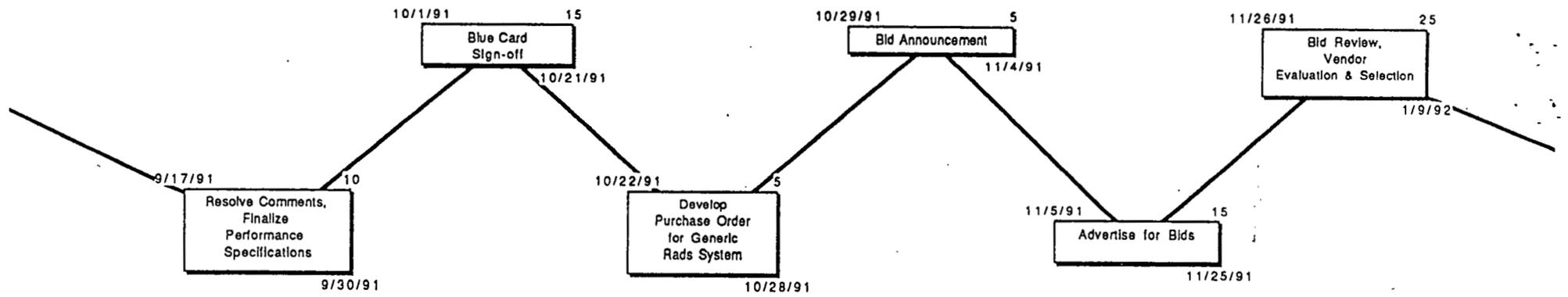
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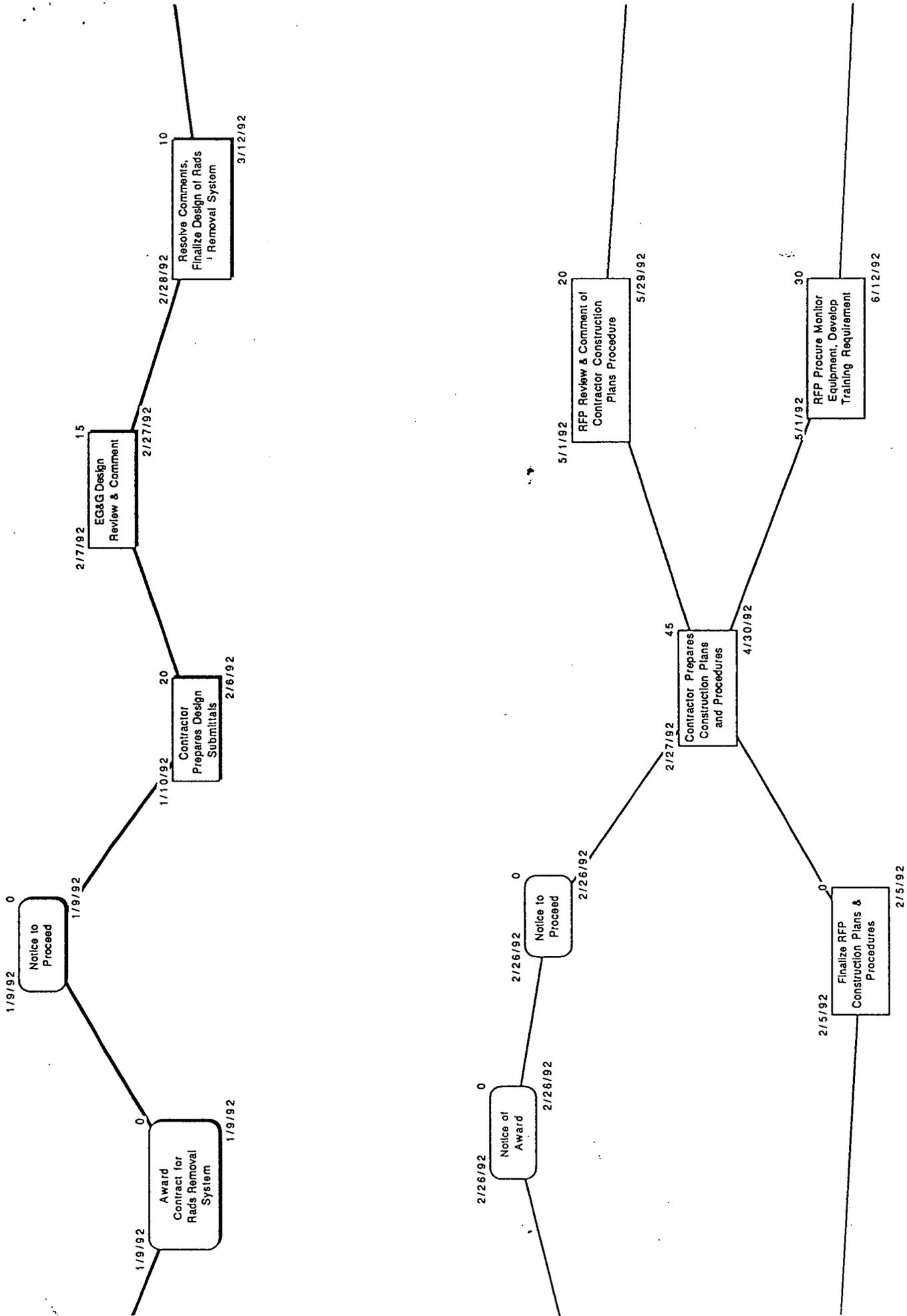
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E. Evered, EG&G/RF
P. Bunge, EG&G/RF
B. Frazer, EPA
J. Schieffelin, CDH

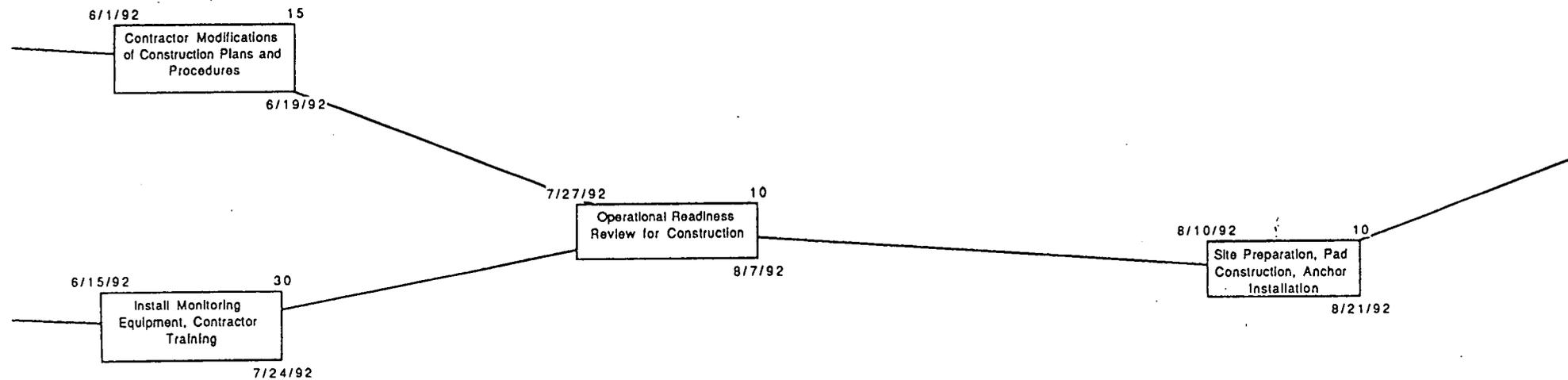
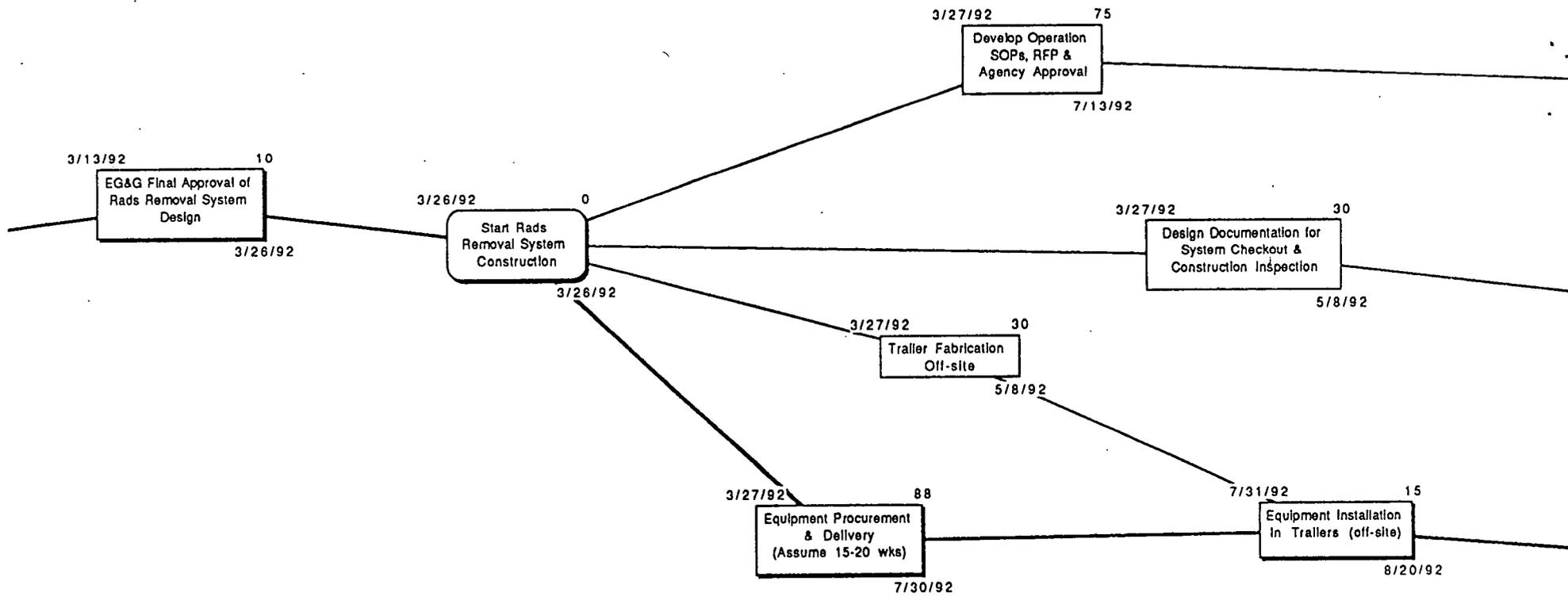


**OU 2 So. Walnut Creek IM/IRA:
Radionuclides Removal System
Design & Construction**

Dated 9/6/91







7/14/92
Operator Training & Verification
20
8/10/92

5/11/92
FOE/FI Develop Inspection Checklists
30
6/22/92

8/21/92
Rads Removal System Delivery to RFP
5
8/27/92

8/28/92
Rads System Installation on RFP, GAC plumbing
10
9/11/92

9/14/92
Entire FTU Inspection & System Checkout
10
9/25/92

9/25/92
Start of Entire FTU Operations
0
9/25/92