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EG&G ROCKY FLATS, INC
ROCKY FLATS PLANT P O BOX 464, GOLDEN, COLORADO 80402-0464 (303) 966 7000

90-RF-3588

Robert M Nelson, Jr
Manager
DOE, RFO

Attention D P Simonson

CONTINGENCY RELEASE PLAN FOR RFP SURFACE WATER PONDS

As requested in letter 0761-RF-90, dated June 12, 1990, EG&G, Environmental Restoration (ER)/Clean Water Act (CWA) is submitting a finalized "Contingency Procedure for Unplanned Releases from Rocky Flats Plant Terminal Detention Ponds A-4, B-5, and C-2". This document incorporates comments received from both DOE/RFO and the State of Colorado Engineering Office. This document will serve as the procedure to be followed in the event that an uncontrolled release of pond water becomes an issue once again.

The Emergency Preparedness (EP) group of EG&G was also notified of your request. EP is actively incorporating ER/CWA's contingency procedure into a formal EP contingency plan and procedures. EP is committed to producing a final draft of the contingency plan by July 3, 1990. DOE/RFO is currently reviewing the draft document for EP and a copy of this plan has been included with ER/CWA's contingency procedure attached. The finalized contingency plan, including the set of implementing procedures, will be completed approximately four weeks after submittal of comments by DOE/RFO. Once a finalized plan has been approved for distribution, a copy will be forwarded to your staff.

Please review the enclosed procedure and plan. If there are any questions or comments about the enclosed procedure and plan, please contact Steve Pettis at extension 5741.

J M Kersh
Associate General Manager

SAP/lmc

Original and 1 cc - R M Nelson, Jr

Attachments
As stated

ADMIN RECORD

A-0006-000550

1/29

Clean Water Act 194



**CONTINGENCY PROCEDURES
FOR UNPLANNED RELEASES FROM ROCKY FLATS PLANT
TERMINAL DETENTION PONDS A-4, B-5 AND C-2**

June 1990

"REVIEWED FOR C1"
By *Sh. [Signature]* ^{UL}
Date 6/24/90 ^{CR}

2/29

Contingency Procedures
for Unplanned Releases from Rocky Flats Plant
Terminal Detention Ponds A-4, B-5, C-2

PURPOSE

This plan provides a description of the circumstances leading to, the requirements for, and the procedure to be followed in responding to unplanned releases from terminal detention Ponds A-4, B-5, and C-2 and provides a list of individuals to be notified in the event that a release is imminent

DEFINITIONS

Unplanned Release

A discharge of impounded pond water necessitated by accumulation of inflows where the continued collection of which, without discharge, would result in exceeding the pond's structural capacity or the release of water over the pond's spillway (Specific calculations and documentation required are described in Responsibilities and Authorities) An unplanned release is normally predictable from the extrapolation of current pond conditions and inflow rates, and allows ample time for notification of impacted parties and planning for release However, treatment of pond water and conditioning of the release on analytical results may not be possible under an unplanned release

Emergency Discharge

A pond water release necessitated by best engineering determination of imminent catastrophic pond failure The urgency of the release would necessitate using the dam outlet structure for release, thus bypassing pond water treatment equipment

RATIONALE AND JUSTIFICATION

Historically, releases from RFP terminal ponds have met stream standards and drinking water quality standards Normal releases have occurred in a controlled manner based on set operational criteria in order to remove excess water from the ponds Recent pond releases have incorporated various treatment operations to further ensure that stream standards are met during discharge

Pond dam safety is the key concern for both unplanned and emergency releases An unplanned release of pond water is the preferred option to partial or catastrophic failure of the pond impoundment Failure will result in the uncontrolled, downstream transport of dam materials and pond sediments and the potential dispersal of contaminated materials The controlled release of pond water possible under an unplanned release minimizes the scouring and dispersal of pond sediments while preserving the contingency storage function of the ponds

Another concern for unplanned releases is discharging pond water over the pond's spillway An unplanned release through the discharge valve will allow the discharged pond water volumes to be monitored and may allow for conditioning of the pond water through pond water treatment equipment An unplanned release is normally predictable from the extrapolation of current

pond conditions and inflow rates, and allows ample time for notification of impacted parties and planning for release. Activated carbon treatment will be used prior to an unplanned release, if needed, and if possible, given the circumstances of the unplanned release. Water quality sampling will be conducted as follows:

- all existing data will be used,
- additional samples will be collected, to the extent possible, and
- cooperation will be provided for the Colorado Department of Health to obtain samples

Release will be coordinated with the State of Colorado to assess the discharge. As much advance notice as possible will be provided to the parties listed under CONTACTS for any release. Parties with operating lake by-passes will be provided with sufficient time to activate their by-pass structure, if possible. Termination of unplanned or emergency releases will be based on engineering evaluations and coordinated with the State Engineer's Office.

Pond dam stability is monitored as required by existing conditions which are subsequently described in this document. Monitoring consists of visual observations of berm distress such as toe seepage, turbidity at the toe or outlet, cracking at berm surface, and measurement of the water levels at piezometers installed in the berms. Currently, pond B-5 is the only berm with piezometers in place.

The level and response rate of the piezometers indicate berm saturation, which may result in sloughing failure at the face of the berm. A marginal safety factor of 1.2 (with an associated confidence interval of +/- 0.2) has previously been reached after a prolonged detention of pond water at a peak of 72% of capacity (An ultimate capacity of 88% was reached). Piezometers will be installed in the berms for ponds A-4 and C-2 and studies performed on these dams to determine their safe storage volumes.

Geotechnical reports and inspections by the Corps of Engineers are being utilized in the monitoring and assessment of the pond berms. Both have recommended against high pool or long-term detention until more detailed analysis is performed. The DOE and United States Corps of Army Engineers (USACE) negotiated an interagency agreement to provide a detailed analysis by the USACE.

REFERENCES

This plan was developed according to DOE Order 5400.1, General Environmental Protection Program and the Emergency Response Plan for Water Detention Pond Dam Failure for Rocky Flats Plant, April 11, 1990.

EFFECTIVE DATE

June 22, 1990

EMERGENCY RELEASES

Nothing in this plan supersedes established protocols for dealing with emergency situations, as described in the Emergency Response Plan for Water Detention Pond Dam Failure for Rocky Flats Plant, April 11, 1990.

RESPONSIBILITIES

The following responsibilities and authorities are assigned

EG&G Environmental Restoration/Clean Water Act (ER/CWA)

Inspect and monitor the terminal ponds on a routine basis. Data shall be relayed to the Facilities Engineering department for evaluation as stipulated under the appropriate Action Level. Actions and notifications shall be determined by the criteria detailed in Action Levels.

EG&G Facilities Engineering (FE)

Evaluate routine terminal pond inspection data provided by ER/CWA. Establish appropriate actions to be taken at each Action Level.

Rocky Flats DOE Staff Duty Officer (SDO)

Receive notification that a release is required, contact Chief, Environmental Monitoring Branch, and others as specified in RFP Staff Duty Officer Manual.

Chief Environmental Monitoring Branch

Confirm necessity of release from EG&G and obtain specific details as to volume, rate, time, and duration of release, and any available water quality data, as compared to specific water quality standards. Notify Colorado Department of Health State Engineers Office and concerned municipalities of any unplanned or emergency release and coordinate release schedule.

ACTION LEVELS FOR POND B-5

Action Level 1

Criteria

- 1 Pool level below 50 percent of spillway capacity (elev 5794.3'), and
- 2 Safety factor above 1.2, and
- 3 No major precipitation events predicted

Action Normal operation, weekly inspections performed by ER/CWA with documentation forwarded to Facilities Engineering.

Action Level 2

Criteria

- 1 Pool above 50 percent, and
- 2 Safety factor above 1.2, and
- 3 Major precipitation event predicted or recently occurred, or
- 4 New seep identified

Action Increase inspection frequency to 3 days per week, with documentation forwarded to Facilities Engineering within 24 hours. ER/CWA will notify EG&G management (J Kersh or designee) of any change in Action Level. ER/CWA will identify equipment to prepare for a potential transfer to Pond A-4 or for treatment and discharge.

Action Level 3

Criteria

- 1 Pool within one foot of spillway, or
- 2 Safety factor at or below 1.2, or
- 3 Increase in existing seepage, or
- 4 Unusual piezometer response

Action Increase inspection frequency to every 24 hours with summary results reported immediately to the Shift Superintendent's Office and documentation forwarded to Facilities Engineering within 24 hours. The Shift Superintendent's Office shall notify the SDO. ER/CWA will notify EG&G management (J Kersh or designee) and Rocky Flats Program Office (RFO) (M Van Der Puy or designee) of any change in Action Level. During off-hours, the SDO will notify RFO. RFO will notify the State Engineers Office, CDH, and the cities of current dam status.

ER/CWA and FE will initiate action to transfer water to Pond A-4 or to discharge with appropriate treatment, with RFO approval. Transfer of water between ponds to alleviate the need for a release is the preferred action for Action Level 3, if possible.

Action Level 4

Criteria

- 1 Seepage rate increasing, or
- 2 A combination of any two criteria in Action Level 3 exist

Action Increase inspection frequency to every 6 hours, 7 days per week, with summary results reported immediately to Shift Superintendent's Office and Documentation forwarded to Facilities Engineering within 24 hours. The Shift Superintendent's Office shall notify the SDO. ER/CWA will notify EG&G management (J Kersh or designee) and RFO (M Van Der Puy or designee) of status. During off-hours, the SDO will notify RFO. RFO will notify the State Engineers Office, CDH, and the cities of current dam status. An on-site inspection by the State Engineer shall be requested.

ER/CWA and FE shall increase the transfer rate to one foot per day of drawdown. If transfer capability is not adequate, initiate an unplanned release through standpipe at a rate of one foot of drawdown per day.

Action Level 5

Criteria

- 1 Seepage exhibits turbidity, or
- 2 Soil movement evident

Action Declare emergency condition by reporting immediately to the Shift Superintendent's Office. The Shift Superintendent's Office shall notify the SDO. ER/CWA will notify EG&G management (J Kersh or designee) and RFO (M Van Der Puy or designee) of status. The Shift Superintendent's Office shall partially or fully activate the Emergency Operations Center (EOC). The Notification Center shall notify the Division of Disaster Emergency Services (DODES) and activate the Colorado Emergency Radiological Response Plan at the Alert Level.

EG&G/FE shall initiate an assessment of personnel safety at and below the pond. If feasible, the release rates will be increased to provide drawdown rate of up to 2 feet

per day, as monitored by Facilities Engineering and ER/CWA

ACTION LEVELS FOR POND A-4 AND C-2

Action Level 1

Criteria

- 1 Pool level below 50 percent of spillway capacity (A-4 elev 5750 3' and C-2 elev 5759 8'), and
- 2 No major precipitation events predicted

Action Normal operation, weekly inspections performed by ER/CWA with documentation forwarded to Facilities Engineering

Action Level 2

Criteria

1. Pool above 50 percent, and
- 2 Major precipitation event predicted or recently occurred, or
- 3 New seep identified

Action Increase inspection frequency to 3 days per week with documentation forwarded to Facilities Engineering within 24 hours ER/CWA will notify EG&G management (J Kersh or designee) of any change in Action Level ER/CWA will identify equipment to prepare for a potential transfer or for treatment and discharge

Action Level 3

Criteria.

- 1 Pool within one foot of spillway, or
- 2 Increase in existing seepage

Action Increase inspection frequency to every 24 hours with summary results reported immediately to the Shift Superintendent's Office and documentation forwarded to Facilities Engineering within 24 hours The Shift Superintendent's Office shall notify the SDO ER/CWA will notify EG&G management (J Kersh or designee) and Rocky Flats Program Office (RFO) (M Van Der Puy or designee) of any change in Action Level During off-hours, the SDO will notify RFO RFO will notify the State Engineers Office, CDH, and the cities of current pond status

ER/CWA and FE will initiate action to transfer water or to discharge with appropriate treatment, with RFO approval Transfer of water between ponds to alleviate the need for a release is the preferred action for Action Level 3, if possible

Action Level 4

Criteria

- 1 Seepage rate increasing

Action Increase inspection frequency to every 6 hours, 7 days per week, with summary results reported immediately to Shift Superintendent's Office and Documentation forwarded to Facilities Engineering within 24 hours The Shift Superintendent's Office shall notify the SDO ER/CWA will notify EG&G management (J Kersh or designee)

and RFO (M Van Der Puy or designee) of status. During off-hours, the SDO will notify RFO. RFO will notify the State Engineers Office, CDH, and the cities of current dam status. An on-site inspection by the State Engineer shall be requested.

ER/CWA and FE shall increase the transfer rate to one foot per day of drawdown, if transfer is possible. If transfer capability is not adequate, initiate an unplanned release through standpipe at a rate of one foot of drawdown per day.

Action Level 5

Criteria

- 1 Seepage exhibits turbidity, or
- 2 Soil movement evident

Action Declare emergency condition by reporting immediately to the Shift Superintendent's Office. The Shift Superintendent's Office shall notify the SDO. ER/CWA will notify EG&G management (J Kersh or designee) and RFO (M Van Der Puy or designee) of status. The Shift Superintendent's Office shall partially or fully activate the Emergency Operations Center (EOC). The Notification Center shall notify the Division of Disaster Emergency Services (DODES) and activate the Colorado Emergency Radiological Response Plan at the Alert Level.

EG&G/FE shall initiate an assessment of personnel safety at and below the pond. If feasible, the release rates will be increased to provide drawdown rate of up to 2 feet per day, as monitored by Facilities Engineering and ER/CWA.

CONTACTS

(RFP Shift Supervisor will maintain off hours telephone numbers)

Broomfield - Gip Wilson (w) 469-3301. Use police dispatch No. 469-0398 or 466-2345 (emergency) if Gip is in field

Westminster - Dave Kaunisto, (w) 430-2400, Dave will contact the City of Thornton (Alternate Kelly DiNatale (w) 430-2400 ext 2180)

Northglenn - Larry Wyeno or Kipp Scott (w) 451-1289

State Dam Engineer - Greg Hammer (w) 866-3581

State of Colorado/Rocky Flats Program Office - Judy Bruch (w) 355-6252 (alternate John Haggard (w) 355-6437 or mobile phone 877-7841.)

RFO - DOE Duty Officer and/or Mark E Van Der Puy (w) 966-2473, Page D1481

EG&G

Farrel Hobbs (w) 966-7006, Page D1079

Ralph Hawes (alternate for Hobbs) (w) 966-2582, Page D1082

Mark Levin (alternate) (w) 966-4237, Page D0604

Leon McGovern (w) 966-4874, Page D1769

Robert James (alternate for McGovern) (w) 966-5006

DRAFT

EPP-171

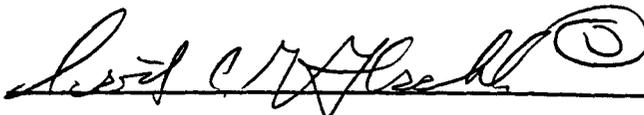
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**EMERGENCY RESPONSE PLAN
FOR
WATER DETENTION POND
DAM FAILURE
FOR
ROCKY FLATS PLANT
GOLDEN, COLORADO**

Emergency Preparedness Program

Issued:

Classification Review By:



Name
Amcl(u)

Enclosure 1

10/29

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

DISTRIBUTION

11/29

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

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April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

1. INTRODUCTION

Walnut Creek delivers raw water to Great Western Reservoir, a drinking water reservoir for the City of Broomfield. Woman Creek delivers raw water to Standley Lake, a drinking water reservoir for the Cities of Westminster, Thornton, and Northglenn. Both these streams have headwaters on Rocky Flats Plant property. The Rocky Flats Plant protects these reservoirs from environmental insult associated with precipitation runoff from the facility through the use of detention ponds. The City of Broomfield has constructed a diversion ditch to carry normal releases, up to 30 cubic feet per second, around Great Western Reservoir. These detention ponds have the capacity to capture the 100 yease recurrence rainfall event of 6.1 inches. The spillways are designed to safely discharge additional runoff from the Probable Maximum Precipitation Event of 23.11 inches.

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

2. PURPOSE

The purpose of this plan is to describe the credible emergency conditions and events that can result in an off-site environmental uncontrolled release, the notifications that will be made, and the response activities required to resolve the situation.

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

3. AUTHORITY

The authority for this plan is:

1. DOE Order 5500.1A, Emergency Management System.
2. The Rocky Flats Plant Emergency Plan.
3. The Colorado Radiological Emergency Response Plan.

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EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

4. SCOPE

The scope of this plan includes definition of credible emergencies that may occur, notification requirements, and the responsibilities of the EOC cadre and field response groups. Implementing procedures are prepared by the cognizant emergency response group personnel.

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

5. INTENDED AUDIENCE

- o Shift Superintendent
- o EOC Cadre Members
- o Clean Water Act Division Personnel
- o Plant Civil Structural Engineering Personnel
- o Plant Support Services
- o Emergency Assessment Systems
- o Environmental Monitoring & Assessment Systems
- o DOE Management
- o EG&G Management
- o Plant Utilities Department

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

6. CREDIBLE EMERGENCIES

Within the scope of this plan, a credible emergency is any situation that results in the uncontrolled release of pond water beyond the detention dam. Such situations include:

- o Overflow of a spillway
- o Slow leak through a dam
- o Partial dam collapse
- o Catastrophic failure of a dam

Each situation may occur individually, escalate from a lower level to a high level of concern, or as simultaneous events. Escalation would probably occur in the following manner:

6.1 SCENARIOS FOR A-4 AND B-5

6.1.1 Partial Uncontrolled Release

- o Precipitation causes runoff to fill pond to the spillway level.
- o Water overtops spillway and flows into Walnut Creek.
- o Erosion or scouring of pond or creek bed is expected. The extent will depend upon the water flow rate.
- o Walnut Creek water will flow into the diversion ditch and around Great Western Reservoir. This assumes flow is less than 30 cubic feet per second and the City of Broomfield maintains the diversion capability.

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EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

6.1.1 Partial Uncontrolled Release (cont)

- o Water flows in excess of 30 cubic feet per second will inundate the diversion ditch and cause excess flow to enter the Great Western Reservoir.

6.1.2 Structural Dam Failure

- o Cracks appear in dam surfaces.
- o Cracks extend, widen, move.
- o Face of dam begins slumping.
- o Approximately 50% breach of dam occurs.
- o Outlet and valve are blocked by material.
- o Limited release during initial phase - slumped portion of dam blocks flow
- o Slumped portion of dam erodes from water flow and allows greater flow over the dam.
- o Approximately 20% of A-4 or B-5 pond water released through breach.
- o Water flows down Walnut Creek drainage, causing erosion and scouring of creek bed.

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EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

6.1.2 Structural Dam Failure (cont)

- o Water erodes and weakens foundation of Indiana Street but probably would not overtop destroy the road. Erosion most likely near culvert.
- o Some water is diverted into diversion ditch causing erosion along the unlined ditch.
- o Water flow is too great for diversion ditch to accommodate. Some water overtops diversion structure and flows directly into Great Western Reservoir, causing some scouring of reservoir bottom.
- o Water flow is too great for some curves in diversion ditch. Water flows out of diversion ditch and into fields toward Great Western Reservoir.

6.2 SCENARIOS FOR C-2

6.2.1 Partial Uncontrolled Release

- o Precipitation causes runoff to fill pond to the spillway level.
- o Water overtops spillway and flows into Woman Creek.
- o No erosion or scouring of pond or creek bed is expected.
- o Water will run directly into Standley Lake Reservoir.

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EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

6.2.2 Structural Dam Failure

- o Cracks appear in dam surface.
- o Cracks extend, widen, move.
- o Face of dam begins slumping.
- o Approximately 50% breach of dam occurs.
- o Outlet and valve are blocked by material.
- o Limited release during initial phase - slumped portion dam blocks flow.
- o Slumped portion of dam erodes from water flow and allows greater flow over the dam.
- o Approximately 20% of C-2 pond water is released through breach.
- o Water flows down Woman Creek drainage, causing erosion and scouring of creek bed.
- o Water erodes and weakens foundation of Indiana Street. Erosion most likely near culvert.
- o Water backs up west of Indiana Street in flat area.
- o Water flows through culvert under Indiana Street.
- o Water flows into Standley Lake, causing some scouring of reservoir bottom.

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

7. RESPONSIBILITIES

The following responsibilities shall be fulfilled within the scope of this plan.

- 7.1 EMERGENCY ASSESSMENT SYSTEMS - Shall monitor weather reports and forecasts, weather alerts and warnings, and prepare local forecasts. Provide coordination with the Clean Water Act Division personnel, and members of the EOC Cadre.
- 7.2 CIVIL STRUCTURAL ENGINEERING - Shall provide specifications, structural assessment of the dam(s), evaluate conditions relative to failure modes and provide predictions of failure. Maintain on-scene monitoring of dam condition and provide information to the EOC through the Shift Superintendent.
- 7.3 CLEAN WATER ACT DIVISION - Shall monitor and sample radioactive/toxic material content/levels on a routine basis under the National Pollutant Discharge Elimination Systems Permit (NPDES). The most recent data will be made available to the EOC cadre for information and initial reporting purposes.
- 7.4 ENVIRONMENTAL MONITORING AND ASSESSMENT (EM&A) - Shall perform post-failure event water sampling both on-site and off-site and provide sampling data to the EOC. EM&A shall also coordinate with off-site agency field monitoring emergency response teams. Sample analysis time may be 12 hours - 10 days, depending upon parameters to be analyzed.
- 7.5 PLANT SUPPORT SERVICES - Shall provide heavy equipment and necessary resources to prevent, or mitigate the effects of dam failure as required. Such resources will be coordinated by the Shift Superintendent. Dam repair materials shall be maintained for use in an emergency.

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EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

- 7.6 SHIFT SUPERINTENDENT - Shall establish the Emergency Control Station (EMS) near the scene and coordinate the on-scene emergency response activities. The Shift Superintendent shall maintain communications with the EOC and provide status reports of the scene conditions.
- 7.7 EOC MANAGEMENT - Shall ensure notifications to off-site agencies are performed. The EOC shall be staffed to a level in each element to ensure the following responsibilities are fulfilled:
- o Notificaiton of the Colorado Division of Disaster Emergency Services.
 - o Executive management decision making.
 - o Public and employee information.
 - o On-scene assessment and evaluation.
 - o On-scene support and resources coordination.
 - o Data processing and communications to off-site agencies.

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

8. PLAN ACTIVATION

The activation of this plan will be based upon an imminent threat of event occurrence and the associated impact of such occurrence. As a radiological incident, the Colorado Radiological Emergency Plan may also be activated initially at the Alert Emergency Response Level, and upgraded in the event of escalation of the situation.

Plan activation will be determined by assessment of immediate and potential conditions, which may include, but are not limited to:

- o Current weather conditions, i.e., rainfall, etc.
- o Forecasted weather conditions.
- o Current levels of water in the ponds.
- o Potential on real increases in water containment levels.
- o Periodic on-scene inspections of dams with indication of potential failures.

April 11, 1990

EPP-171 Emergency Response Plan for
Water Detention Pond Dam Failure

9. IMPLEMENTING PROCEDURES

Emergency Response Procedures which implement this plan are as follows:

- EPP 171-1 Notifications Procedure
- EPP 171-2 Dam Response Team Procedure
- EPP 171-3 Environmental Monitoring and Assessment Procedure
- EPP 171-4 Emergency Assessment Systems

Environmental Restoration

CWAD

Clean Water Act Division

Task Tracker

Number.

Date Received:

Date Assigned:

Date Due:

Group Code:

Priority.

Assigned to:
Last Name First Name MI

Description of Action Required:

Complete and submit a final draft of the "Contingency Plan For Unplanned Releases and Emergency Discharges from Rocky Flats Plant Terminal Detention Ponds A-4, B-5, C-2 "
Letter # 0761-RF-90 dated 6/12/90 / #

Comments:

Keith - we need to decide if this should be a procedure (controlled document) I think that it should I think that this will be a tough deadline John Hayen of Emergency Preparedness is working on the plan - submitted to him ~4/13/90 by Steve Pettis

Date Completed:

Please return this form with your completed action response to Lisa Craig.

26/29

CORRES CONTROL
INCOMING LTR NO

United States Government

Department of Energy

Rocky Flats Center

0761 RF 90

memorandum

DUE DATE 6-22-90

ACTION F Hobbs DATE JUN 12 1990

DIST LTR ENCL
TO: DIRECTOR

ER/EPD JJR 6658

DIST	LTR	ENCL
ALLHOFF FH		
BRENNAN JH		
BRETZKE JC		
BURLINGAME AH		
DAVIS JG		
FERRERA DW		
FERRIS LB		
FRANCIS GF		
GOODWIN R		
HEALY TJ		
HECKER EH		
KERSH JM	X	X
KIRBY WA		
MAJESTIC JR		
McKINLEY KB		
MELLEN JB		
PARNELL RF		
POTTER GL		
RHODES JL		
RISNER VL		
SANFORD TH		
SHANNON WM		
VAN LEUVEN DB		
WEBER BP		
WONG ER		
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BETCHER DH		
CARNIVAL GJ		
HARMAN LK		
HEBER JL		
HOFFMAN RB		
KLAMMAN RL		
KREIC DM		
LOJENBERG GE		
NAIMON ER		
NEWBY RL		
TURNER HL		
VELASQUEZ RN		
F Hobbs	X	X

Completion of "Contingency Plan for Unplanned Releases and Emergency Discharges from Rocky Flats Plant Terminal Detention Ponds A-4, B-5, C-2"

TO: Jack Kersh, Associate General Manager
Environmental Restoration and Waste Management
EG&G Rocky Flats, Inc

The purpose of this memorandum is to request completion and submittal of the aforementioned Contingency Plan by Friday, June 22, 1990, a submittal deadline reached in coordination with your staff. We have received comments on the Contingency Plan from Greg Hammer, P E , of the Colorado Office of the State Engineer. A copy is attached for your reference, we request that these comments be incorporated into the document submitted to us

We ask that the Contingency Plan submitted to us be a stand-alone document marked as a Final Draft. Upon receipt and our review, we will distribute the document to commenters. Assuming we receive no further comments, we will then authorize finalization of the Contingency Plan

Please feel free to call me or have your staff call Tom Lukow of my staff at extension 4561 if you have any questions in this regard.

David P. Simonson
David P. Simonson, Acting Assistant
Manager for Environmental Management.

Attachment

cc w/Attachment.
J Rampe, DOE/RFO
F Hobbs, EG&G/RF

CORRES CONTROL	X	X
CONTRACT ADMIN		
<i>FRM</i>	X	X

Received for Addressee
Corres Control RFP

6-13-90
By *[Signature]*

Ref Ltr #

FOR THE DIRECTOR
ROCKY FLATS CENTER
CORRES CONTROL

JUN 13 1990

27/29

ROY ROMER
Governor



JERIS A DANIELSON
State Engineer

OFFICE OF THE STATE ENGINEER
DIVISION OF WATER RESOURCES

1313 Sherman Street-Room 818
Denver, Colorado 80203
(303) 866-3581

March 22, 1990

Mr. Farrel D. Hobbs
Manager, Clean Water Act Division
EG&G ROCKY FLATS
Rocky Flats Plant
P O Box 464
Golden, CO 80402-0464

Dear Mr Hobbs,

I have reviewed the "Contingency Plan for Unplanned Releases " and offer the following comments and changes

Dam B-5

Action Level 2: I suggest that the first condition be changed to be simply "Pool above 50% or". The situation of the lake level nearing the spillway is better addressed at Action Level 3 In addition a notification to State agencies, or at least the Dam Safety Branch would be prudent, although this does not need to be officially identified at this level.

Action Level 3: At this level the Dam Safety Branch should be notified of conditions at the dam It will not require an active response on our part, but we would begin preparations for dealing with a situation that may continue to deteriorate.

Action Level 4: Notification to the Dam Safety Branch should include a request for an on-site inspection.

Action Level 5: With the earlier notices, you can delete the mention of contact to State agencies The Dam Safety Branch would most certainly need to be present in this condition of alert

Dams A-4 & C-2

Action Level 2: Suggest you delete the condition "minimum one foot below spillway" Again, this will be addressed in Level 3

Action Level 3: You should include notification to the Dam Safety Branch at this level I also recommend that you delete the last sentence, "Initiate action to release water at a rate equal to inflow." Under normal conditions, an "emergency release" is not warranted

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Action Level 4: Notification to the State is required at this level, and may include a request for an inspection of the dam. Action to make releases should be initiated at this level.

Action Level 5: With the prior notification the Dam Safety Branch would be expected to be on-site at this level. Notification would not be necessary as a result.

As we discussed earlier, some of these actions are not always as clear cut as they may seem on paper. Accordingly the presence or involvement of an engineer who is knowledgeable about dams will greatly improve the response to conditions as they may change. Feel free to contact us as you see the need.

I am sending you a copy of our guidelines for preparation of an Emergency Preparedness Plan (EPP) for your assistance. I would direct your attention to page 4, which briefly describes the various levels of emergencies as we define them.



Greg Hammer, PE
Senior Professional Engineer

COPY FAXED TO DEPT OF HEALTH