

NOTICE:

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**PORTIONS OF THE FOLLOWING
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The Administrative Record Staff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

THE GOOD FUND LTD. - 1972)
et al.)

Plaintiffs)

vs.)

Civil Action No 75 M 1111
75 M 1162
75 M 1296

MARCUS F CHURCH and MARCUS F)
CHURCH, TRUSTEE et al)

Defendants)

CHURCH'S INTERROGATORIES
OF DECEMBER 21 1976
(Civil Action No 75 M 1162)

Plaintiffs Marcus F Church and Marcus F Church Trustee ("Church") request that the Defendants United States of America Dow Chemical Company and Rockwell International Corporation answer the interrogatories below within 30 days or sooner

Provide answers to each of the interrogatories numbers 1 through 6 for each soil sampling result reported in the following documents

(a) "Soil Sample Results to Date (12-22-⁶⁹68) ' S E Hammond to J F. Willging December 26 1969

(b) "Rocky Flats Environmental Monitoring Results - May 1970

(c) RFP-ENV-72 Annual Environmental Monitoring Report Rocky Flats Plant January - December 1972 " Dow Chemical April 13 1973

(d) Attachment to letter from W H Lee to Mr F E Abbott concerning Rocky Flats soil sampling dated May 18 1970 and entitled Offsite Plutonium Results "

(e) Attachment to letter from William J Major to Mr Stanley Hammon April 1, 1970

Field log books: none

ADMIN RECC2D

A-0011-000 06

(f) RFP-ENV-71B "Annual Report Environmental Safeguard 71
Dow Chemical U.S.A. Rocky Flats Division, March 10 1972

(g) "Soil Sampling East of Indiana Avenue " R W Loser,
November 29, 1972

(h) "Soil Sampling Report - Week Ending March 19 1971 " dated
March 23, 1971

1. Describe the methods and tools used to collect the samples
- 2 What was the depth of each sample in centimeters?
- 3 (a) State whether each result states the concentration of the radionuclide for the fines only or for fines plus rocks or some other fraction
(b) State the amounts of fines rocks or other fraction for each sample
4. Which if any of these soil sample results include a correction for plutonium recovery percentage?
- 5 Describe the methods by which the plutonium recovery percentage is determined and corrected for
- 6 For any soil sample results for which correction for plutonium recovery percentage is not made provide the recovery percentage
- 7 Provide the locations of the soil samples the analytical results of which are recorded in the laboratory logbooks supplied to Church for the years 1970, 1971 and 1970-1971 listed below by page number and sample number

"Site Survey 1970"

<u>Page</u>	<u>Sample Numbers</u>
6	111 - 121 inclusive
12	260 - 308 inclusive
20	440 - 454 inclusive

Provide answers to each interrogatory numbers 9 through 15 for each of these radionuclides:

- (a) Tritium
- (b) Co^{60}
- (c) Sr^{89} and Sr^{90}
- (d) Cs^{137}
- (e) Ce^{144}
- (f) Pm^{147}
- ✓(g) Enriched Uranium
- (h) Depleted Uranium
- (i) Natural Uranium
- (j) U^{232}
- (k) U^{233}
- (l) U^{234}
- (m) Np^{237}
- (n) Pu^{236}
- (o) Pu^{238}
- ✓(p) Pu^{239}
- ✓(q) Pu^{240}
- ✓(r) Pu^{241}
- (s) Pu^{242}
- (t) Am^{241}
- (u) Am^{243}
- (v) Cm^{244}
- (w) Cm^{245}
- (x) Cf^{251}

(y) Cf^{252}

9. What quantities in grams, kilograms or curies of each of these radionuclides have been received at the Rocky Flats Plant each year since 1951? If none, so state

10. What quantities of each of these have been processed or used at the Rocky Flats Plant each year since 1951? If none so state

11. What quantities of each of these have been spilled, burned or otherwise released to the environment at or near the Rocky Flats Plant each year since 1951? If none, so state for each radionuclide

12. What quantities for each of these have been dispatched from the Rocky Flats Plant each year from 1951 to the present in a) devices, b) waste, c) other, and d) total? If none so state

13. Have any other radionuclides other than those described above or in inventories of "sources" such as that inventory provided to Church ever been present at the Rocky Flats Plant in gram quantities or greater?

14. If the answer to 13 is anything other than an unqualified negative, list each such radionuclide and the quantity of each that has been received for each year since 1951.

15. Describe in general (e.g., burning in unfiltered outside incinerator, burial in Tunnel No. ___ monthly shipment to Idaho) the waste disposal practices from 1951 to the present for waste containing one or more of the above listed radionuclides or any listed in response to 13 as they existed at the time of the presence of each such radionuclide at the Rocky Flats Plant. If waste practices differed for different radionuclides, state the practices for each. Describe major changes to these policies and their effective dates.