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**Subject:** RFLMA Notification of a Reportable Condition at Point of Evaluation SW027  
**Date:** Thursday, June 18, 2015 2:49:48 PM

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## NOTIFICATION OF A REPORTABLE CONDITION UNDER RFLMA ATTACHMENT 2, SECTION 6.0, ACTION DETERMINATIONS

This notification is to inform you of a reportable condition under RFLMA Attachment 2, Section 6.0, Action Determinations, at the RFLMA Point of Evaluation, SW027. RFLMA Attachment 2 Section 6 or Figure 6 require informing regulators and the listed stakeholders within 15 days of receipt of validated data, and providing to CDPHE and EPA within 30 days a plan and schedule for an evaluation to address the condition. Although informal notification has already been made to CDPHE and EPA, this e-mail serves as the formal notification.

A reportable condition was determined on June 11, 2015 based on evaluation of recently available validated analytical results for plutonium (Pu-239,240) from the composite samples collected during the period 5/7/14 - 5/8/15. Americium (Am-241) is not reportable at this time. Following is a synopsis of the data:

No samples collected 5/7/14 – 3/8/15 due to lack of flow

Composite 3/9 – 3/11/15; Pu = 0.116 pCi/L, Am = 0.030 pCi/L

Composite 3/11 – 4/17/15; Pu = 0.139 pCi/L, Am = 0.030 pCi/L

Composite 4/17 – 5/6/15; Pu = 0.251 pCi/L, Am = 0.040 pCi/L

Composite 5/6 – 5/9/15; Pu = 1.02 (duplicate 0.754) pCi/L, Am = 0.18 (duplicate 0.157) pCi/L

The evaluation was performed in accordance with RFLMA Attachment 2, Figure 6, Points of Evaluation, which resulted in 12-month rolling average values for Am of 0.037 pCi/L and Pu of 0.22 pCi/L on 4/30/15. The applicable RFLMA Table 1 Standard for Am and Pu is 0.15 pCi/L.

Flow-through operations at Pond C-2 were initiated on 11/7/11. The recent Pu and Am results from downstream location GS31 (Pond C-2 outlet) are higher than normal. Results from the downstream Point of Compliance WOMPOC (Woman Cr. at COU boundary) have been received through 5/17/15; all results were below RFLMA Table 1 Standard of 0.15 pCi/L and in fact below 0.09 pCi/L.

While the 12-month rolling average for Am is not reportable, the evaluation of the reportable Pu values will include consideration of the Am results.

Pursuant to RFLMA Attachment 2, Section 6.0, Action Determinations, for a reportable condition:

\* DOE must submit a plan and schedule for an evaluation to address the condition within 30 days of receiving the validated data for the reportable condition.

\* DOE will consult with CDPHE and EPA to determine if mitigating actions are necessary.

\* The objective of consultation will be to determine a course of action (if determined necessary) to address the reportable condition and to ensure the remedy remains protective.

\* Results of consultation will be documented in contact records and/or written correspondence.

Although further evaluation and consultation is required, some preliminary steps will be taken to inform the evaluation. Rocky Flats staff walked down the SW027 drainage on 6/17/15 to inspect for any obvious conditions promoting potential soil erosion. The personnel identified a few areas where additional revegetation could improve soil cover, and where wattles along with products such as GeoRidges could reduce erosion. A consultation with the RFLMA parties is scheduled for June 23, 2015.

If you have any questions, please contact:

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