FINAL
RESPONSIVENESS SUMMARY

FOR

ROCKY FLATS PLANT
COMMUNITY RELATIONS PLAN

Environmental Restoration Program

U.S. Department of Energy
Rocky Flats Plant
Golden, Colorado

Prepared by
EG&G Rocky Flats, Inc.
Community Relations
P.O. Box 464, Building T130F
Golden, Colorado 80402-0464
Jill G. Paukert, Author

December 4, 1991

ADMIN RECORD

By
Date
A-SW-000221

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1.0 BACKGROUND AND INTRODUCTION

The draft ***Rocky Flats Plant Community Relations Plan - Environmental Restoration Program*** describes the mechanisms through which the Rocky Flats Plant near Golden, Colorado, will inform and involve the public in environmental restoration and related environmental activities at the facility. Development of the plan is driven by the community relations provisions of two federal laws concerning hazardous materials management and cleanup, the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments Act, and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act.

The plan also complies with the applicable requirements of the Colorado Hazardous Waste Act, which authorizes the state to enforce the RCRA program, and the Interagency Agreement on environmental restoration, which was negotiated and signed by the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA) and the Colorado Department of Health.

The public was invited to comment on the draft Community Relations Plan during a 60-day public comment period from January 30, 1991 to March 30, 1991. On January 30, 1991, DOE published an advertisement in three major Denver area newspapers, announcing the document's availability and two public meetings on the plan. Also, a copy of the advertisement was mailed to more than 1600 individuals and organizations on the plant's mailing list, and a press release was disseminated to the local media.

The first public meeting, held February 21, 1991, was an information meeting designed to answer questions about the plan. The second meeting was the public comment meeting held on March 13, 1991. A transcript of the public comment meeting was placed in the five area information repositories for Rocky Flats documents and mailed to those who requested a copy in writing. Written public comments were submitted to the DOE Rocky Flats Public Affairs Officer.

This Responsiveness Summary provides DOE's responses to public comments on the draft Community Relations Plan. The responses were provided to EPA and CDH for review and comment before finalization. Likewise, changes to the draft Community Relations Plan as a result of public comments have been reviewed and approved by EPA and CDH. Copies of the Responsiveness Summary and the final Community Relations Plan are available upon request. In addition, the documents are available for public review at the following locations:

U.S. Department of Energy Rocky Flats Public Reading Room
Front Range Community College Library
3645 West 112th Avenue
Westminster, Colorado 80030
(303)469-4435

Rocky Flats Environmental Monitoring Council
1536 Cole Boulevard, Suite 325
Building 4, Denver West Office Park
Golden, Colorado 80401
(303)232-1966

U.S. Environmental Protection Agency
Region VIII
Superfund Records Center
999 18th Street, Suite 500
Denver, Colorado 80202-2405
(303)293-1807

Colorado Department of Health
4210 East 11th Avenue, Room 351
Denver, Colorado 80220
(303)331-6733

U.S. Department of Energy
Freedom of Information Office
1000 Independence Avenue, SW
Washington, D.C. 20585
(202)586-6025

The Responsiveness Summary divides the oral and written comments into 155 individual comments and offers a response for each one. When a comment is similar to one made previously, the reader is directed to the response to the previous comment. Two comment summary tables are included.

The Responsiveness Summary is organized into four chapters in addition to this Background and Introduction chapter. Chapter 2.0 summarizes the issues that received the most attention from the commentors. Chapter 3.0 lists the individuals who offered oral and/or written comments on the draft Community Relations Plan. Section 4.0 provides the written public comments and the DOE response to each. Similarly, Section 5.0 provides the oral public comments and the DOE response to each.

2.0 COMMENT SUMMARY

The public comment process is an important mechanism for effective public involvement in DOE decisions regarding Rocky Flats. DOE appreciates the time and effort required of citizens who prepared comments on the draft Community Relations Plan and encourages these citizens and others to continue to seek responses to their questions and concerns about Rocky Flats activities.

Many changes are reflected in the final Community Relations Plan as a result of public comments, demonstrating that the comment process is a valuable one for both DOE and the public. As the final Community Relations Plan is implemented, DOE will continue to look to citizens for feedback and suggestions on public information and involvement in the plant's environmental restoration efforts.

2.1 COMMENT ISSUES

The written and oral comments offered by members of the public address concerns in 34 issue areas. The comments are divided among the issue areas for general analysis based on the main issue or issues identifed by the commentor. Table 1 lists the main issues addressed by the comments and provides the number of comments received on each issue. Comments that were offered by a commentor both orally and in writing are counted twice. Also, comments that pertain to more than one issue area are counted in each. Table 2 lists the specific comment numbers for the comments concerning the identified issues.

2.2 COMMENT ANALYSIS

More than one third of the 155 comments received fall under seven issue areas:

1957 and 1969 Fires (11 comments)
General History/Technical Detail (11 comments)
Public Meetings/Comment Opportunities (10 comments)
Technical Review Group (9 comments)
Site Description (8 comments)
Land Use (6 comments)
Offsite Contamination (6 comments)

Several commentors disputed the effects of certain significant accidents or incidents as stated in the draft Community Relations Plan, particularly the 1957 and 1969 fires and contamination from the area now known as the 903 Pad. Comments about the fires reflect the variety of public opinions about the amounts of radiation released by the two accidents.

A range of comments address the draft plan's historical accounts and absence of technical detail. In some cases, commentors asked for the addition of specific data or the discussion of specific historical events or activities not already included in the draft plan. In other cases, the historical summary was criticized overall.

Comments about public meetings and public comment opportunities generally focus on the need for earlier and increased opportunities for involvement in environmental restoration decisions. Some comments on this topic criticize DOE for recently scheduling too many public meetings within a short timeframe. Other comments charge that public opinions and comments solicited by DOE are not taken into account and do not result in procedural or policy changes.

The Site Description section of the draft Community Relations Plan is the subject of comments concerning two issues. Most of the comments in this area argue that the plan's site description does not accurately indicate the plant's proximity to nearby homes and businesses. The remaining comments ask for a clearer, more complete description of the plant's drainage system into Standley Lake and Great Western Reservoir.

Comments concerning the Technical Review Group are very similar in that they are all supportive of the early public involvement afforded by this mechanism. One commentor asked that the Technical Review Group be established before finalization of the Community Relations Plan. Others requested the inclusion of more detail about the group in the final plan.

The comments about the draft plan's discussion of land use around the plant call for either the addition of information about commercial development in the area or the clarification of land use information already provided in the plan. One comment identifies inaccuracies in a land use map included in the plan and offers assistance in preparing a map that is more representative of the area.

Offsite contamination is the subject of a myriad of comments. One commentor stated that the draft plan does not adequately describe offsite contamination. Another expressed concern that the draft plan does not list public comment opportunities for documents developed as part of the environmental restoration effort for the offsite contamination area. Still others commented on the current remediation of offsite soils under a 1985 lawsuit settlement agreement. Lastly, the stability of buried contaminated sediments in the bottom of Standley Lake and Great Western Reservoir is included as a topic of concern.

Other issues about which public comments were offered include the status of plutonium operations, the development and availability of documents and informational materials, the establishment and maintenance of information repositories, the effects of the 1973 tritium release, the reporting of past anti-nuclear and pro-nuclear rallies and the development of a dispute resolution process for citizens. A variety of additional issues, also raised through public comment, are listed in Tables 1 and 2.

Only the issues that received a high level of attention from the public are discussed in this comment analysis. Detailed information on all of the comments and responses is provided in Sections 4.0 and 5.0.

TABLE 1
COMMENT TABULATION

Issue	Number of Comments Received
Miscellaneous	16
1957 and 1969 Fires	11
General History/Technical Detail	11
Public Meetings/Comment Opportunities	10
Technical Review Group	9
Site Description	8
Land Use	6
Offsite Contamination	6
903 Pad Areas	5
Plutonium Operations	5
Alpha Radiation	5
Dispute Resolution	5
Area Population	4
Fact Sheets/Citizen Guides	4
Information Repositories	4
Information Availability	4
Tritium Incident	4
Anti-Nuclear and Pro-Nuclear Rallies	4
Groundwater Monitoring/Contamination	3
Speakers Bureau	3
Unplanned Event Reporting	3

Administrative Record	3
Advisory Committee on Nuclear Facility Safety (Ahearne Committee)/ Defense Nuclear Facilities Safety Board (Conway Board)	3
Quality/Review of Community Relations Plan	3
Responsiveness Summaries	3
Environmental Restoration Update	3
Meeting Notification	2
Radial Distance from Plant	2
Classification System	2
Defined Community	2
Federal Raid	2
Area Schools/Hospitals	2
Public Tours/Visitors Center	2
Need for Independent Oversight	2

TABLE 2
ISSUE BREAKDOWN

Issue	Comments Pertaining to Issue
Miscellaneous	1, 6, 12, 19, 26, 31, 32, 56, 84, 104, 114, 133, 135, 137, 154, 155
1957 and 1969 Fires	5, 35, 36, 57, 74, 75, 93, 94, 126, 138, 147
General History/Technical Detail	3, 34, 73, 82, 87, 90, 91, 109, 128, 130, 143
Public Meetings/Comment Opportunities	16, 17, 22, 27, 28, 54, 98, 100, 103, 118
Technical Review Group	14, 22, 28, 52, 55, 66, 122, 136, 151
Site Description	29, 71, 88, 105, 106, 108, 134, 142
Land Use	7, 47, 48, 49, 50, 115
Offsite Contamination	38, 51, 53, 77, 78, 81
903 Pad Areas	39, 79, 95, 110, 138
Plutonium Operations	45, 60, 63, 96, 113
Alpha Radiation	59, 83, 97, 112, 148
Dispute Resolution	67, 117, 145, 150, 153
Area Population	9, 10, 46, 127
Fact Sheets/Citizen Guides	13, 18, 20, 21
Information Repositories	15, 119, 120, 132
Information Availability	24, 42, 64, 118
Tritium Incident	40, 58, 80, 111

Anti-Nuclear and Pro-Nuclear Rallies	41, 85, 129, 139
Groundwater Monitoring/Contamination	4, 5, 61
Speakers Bureau	11, 43, 69
Unplanned Event Reporting	23, 37, 76
Administrative Record	44, 70, 144
Advisory Committee on Nuclear Facility Safety (Ahearne Committee)/Defense Nuclear Facilities Safety Board (Conway Board)	63, 107, 125
Quality/Review of Community Relations Plan	68, 124, 141
Responsiveness Summaries	86, 123, 146
Environmental Restoration Update	65, 149, 152
Meeting Notification	2, 121
Radial Distance from Plant	8, 30
Classification System	25, 92
Defined Community	33, 72
Federal Raid	62, 99
Area Schools/Hospitals	89, 116
Public Tours/Visitors Center	101, 102
Need for Independent Oversight	131, 140

3.0 LIST OF COMMUNITY RELATIONS PLAN COMMENTORS

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4.0 RESPONSES TO WRITTEN COMMENTS

COMMENTOR: Neal G. Berlin, City Manager, City of Arvada

The City of Arvada welcomes this opportunity to comment on the draft Rocky Flats Plant Community Relations Plan. We are pleased that a mechanism exists to solicit comments on the draft plan from local jurisdictions and individuals since this document will prescribe how community relations interactions will be handled between the Department of Energy (DOE), EG&G and the public. Below please find our comments on the draft Community Relations Plan.

Comment 1

1. *The Community Relations Plan is intended to set the course of community relations at Rocky Flats for the future. Arvada finds the plan lacking in detail. Only 1/3 of the document, not including the attachments, provides specific information on how the plan will be carried out. We desire more specifics in the Community Relations Activities section of the final plan. Some of our comments below reflect on the plan's lack of detail. Hopefully these comments set the tone for the type of information we expect in the final plan.*

Response to Comment 1

Some descriptions of planned community relations activities are very specific. Where the plan lacks detail, it does so to allow for flexibility in how activities are carried out. The plant anticipates that, as this comprehensive public information and involvement effort evolves, both the plant and the public will experiment with and improve methods of communicating and cooperating.

Comment 2

2. *Throughout the draft plan statements are made that notices, information, etc., will be published at a minimum in a major daily newspaper in the Denver area. One of the major daily newspapers should be specified to carry this information so the public will know where to find the information and not have to search through different newspapers. In addition, publication of the notices, information, etc., should be printed in the community newspapers of nearby municipalities such as Broomfield, Westminster, and Arvada.*

Response to Comment 2

The Interagency Agreement (IAG) between DOE, the U.S. Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) requires DOE to advertise public meetings in a newspaper of general circulation. The IAG also requires DOE to send a direct mail notice to everyone on the Rocky Flats mailing list.

DOE has gone beyond this requirement by publishing display advertisements to announce public meetings consistently in all three major newspapers in the Denver area: the Denver Post, the Rocky Mountain News and the Boulder Daily Camera. We advertise in the major newspapers to provide wide coverage in the metro area. Also, advertising space is expensive, and limiting our notification to one major newspaper could be viewed as favoritism, which we feel is inappropriate.

In addition, as required, we mail a copy of the display advertisement to over 1800 individuals and organizations that have expressed interest in receiving Rocky Flats information. We also issue meeting announcements in the form of press releases to all local media, which often results in a notice in the calendar section of various newspapers.

Comment 3

SITE DESCRIPTION

Plant History

1. *The historical information contained in this section chronicles operations at the plant through the early 1970s. Arvada believes that more current information on general operation activities, release events, and cleanup to date should be included. Examples: the 1989 F.B.I. raid, the 1989-1991 plant shutdown, waste shipment issues, the recommended corrective actions prepared by the Tiger Team and findings of the Ahearne Committee.*

Response to Comment 3

The federal raid and the subsequent DOE Tiger Team are discussed in the draft plan. The shipment of waste generated by activities other than environmental restoration would be addressed more appropriately in a future plan on waste management. However, as the environmental restoration process moves into cleanup activities that involve waste transportation and disposal, the Community Relations Plan should be amended to take concerns about these activities into account.

Lastly, brief information on the 1989 suspension of plutonium operations and on recommendations issued by the Defense Nuclear Facilities Safety Board (Conway Board) and the Advisory Committee on Nuclear Facility Safety (Ahearne Committee) have been added to the final plan.

Comment 4

2. *More precise information should be provided to explain the current state of the wells in place at the plant. The impression gained through review of the draft text is that good, verifiable data can be acquired from all wells in place at the facility. In reality not all wells provide quality data, nor are all wells currently used to collect data.*

Response to Comment 4

The discussion of wells in the final plan has been revised to indicate that DOE is currently evaluating the plant's older wells to determine whether any should be abandoned or replaced.

Comment 5

3. *There are two places within the document, Paragraph 6, Page 7, and Paragraph 2 on Page 11, where Arvada believes that more definite language should be used. Paragraph 6 on Page 7 should read: "The explosion of flammable vapors in the building contributed to a release of plutonium from the building."*

   Paragraph 2, Page 11 should read: "Extensive environmental monitoring of the site indicates that the groundwater contamination has not migrated beyond the plant's boundaries."

Response to Comment 5

The statement about the 1957 fire has been revised in the final plan per your comment.

In response to the second suggestion, although no groundwater contamination has been detected beyond the plant boundaries, inconsistent and possibly invalid sample data from a monitoring well in the eastern section of the plant's buffer zone indicated the presence of volatile organic compound contamination. DOE is currently investigating the movement of groundwater on and around the site.

Comment 6

4. *Measurements for radiation should be kept constant and definitions of the measurements should be provided. How much radiation is a microcurie, and what are the health effects of radiation exposure to a microcurie?*

Response to Comment 6

The differences in units of measure for radiation in various media make it difficult to use constant measurements in describing radiation associated with Rocky Flats. Definitions of curie, picocurie and microcurie have been added to the Glossary of Terms in Appendix G of the final plan.

Comment 7

COMMUNITY BACKGROUND

Community Profile

1. *Information in this section fails to include the planned development of the Jefferson Center in Arvada. More detail of that planned development should be included.*

Response to Comment 7

Information about the Jefferson Center has been added to the final plan.

Comment 8

2. *To better orient readers the final plan should describe where five and ten miles from the plant is measured from. Are they measured from the buffer zone or the manufacturing plant itself?*

Response to Comment 8

The measurements are made from the center of the plant's developed area. A statement to that effect has been added to the plan.

Comment 9

3. *Figure 5 does not correspond to the preceding information on Page 13, describing the Figure. The text states, "Close to 9,000 people live within five miles of the plant, primarily north and southwest of Standley Lake." This statement is incorrect demographically and as depicted on Figure 5. The statement should be revised to reflect the true current population distribution of the area around Standley Lake.*

Response to Comment 9

The statement in the draft plan is confusing because it is not made clear that the areas east and southeast of the lake fall outside the five-mile radius of the plant. The sentence has been clarified in the final plan.

Comment 10

4. *Information relative to current land uses and population distributions ten miles from the plant should be revised to reflect current demographics especially to the north, south, and east of Standley Lake.*

Response to Comment 10

The population of the area within a 10-mile radius of the plant has been added to the final plan as well as a reference to the residential development around Standley Lake.

Comment 11

Chronology of Community Involvement

1. *In Paragraph 6 on Page 17, the statement is made that "During 1990, Rocky Flats speakers were invited to address more than 5,100 people in 105 community groups and schools." Does this figure include information exchange meetings with local jurisdictions such as the Exchange of Information and Environmental Restoration meetings?*

Response to Comment 11

No, the Speakers Bureau figure does not include information exchange or environmental restoration meetings with local jurisdictions. Rather, it includes meetings and other gatherings of civic organizations, professional societies, schools, churches and similar groups of interested citizens who have requested speakers from the plant. Our regularly scheduled meetings with municipalities, public meetings and meetings with the EPA and CDH are not considered Speakers Bureau events.

Comment 12

Key Community Concerns

1. *Arvada finds this section very basic and non-detailed. We had expected that the section would provide more information on the myriad of comments which had to have been received from the 67 community interviews. The community interview process was extensive and time-consuming, two and one half pages of text could not depict the comments made during the process. The final plan should better reflect those comments.*

Response to Comment 12

The discussion of key community concerns is just that—a review of the concerns that, according to the community interviews, are most prevalent among citizens in the area around Rocky Flats. A detailed summary of concerns and issues identified in the interviews is included in the Administrative Record. The summary is entitled, ***Summary of Community Interview Responses Gathered for Development of the Rocky Flats Plant Community Relations Plan - Environmental Restoration Program.*** Microfiche copies of the Administrative Record will be available to the public at the information repositories listed in Appendix D of the Community Relations Plan, with the exception of the DOE Freedom of Information Office in Washington, D.C.

Comment 13

OBJECTIVES

1. *Paragraph 3, Page 21, indicates that the plant will respond to the public's need for information by developing fact sheets and citizen guides on topics of interest to the public. Arvada would like a description of who will determine which topics are of concern to the public, and how that process will be carried out. (See Comment 1, COMMUNITY RELATIONS ACTIVITIES, Additional Activities, for other comments related to fact sheets and citizen guides.)*

Response to Comment 13

DOE's Public Affairs Office is constantly identifying topics for fact sheets and citizen guides on environmental restoration based on environmental cleanup regulations, current and planned cleanup activities, formal and informal citizen requests and general expressions of public interest. Suggestions of fact sheet topics from the public should be directed to the Community Relations Plan Information Coordinator listed in Appendix A of the plan. This information has been added to the final Community Relations Plan.

Comment 14

2. *More detailed information about the Technical Review Group and its responsibilities should be outlined in the final plan including but not limited to: the number of members; who will comprise the membership; how often the group will meet; and what kind of documents the group would review.*

Response to Comment 14

DOE expects that the newly established Technical Review Group's scope, membership and frequency of activity may change over time as the group evolves. The description you request has been added as Appendix F in the final plan.

Comment 15

COMMUNITY RELATIONS ACTIVITIES

Required Activities

1. *Information provided in the draft plan indicates that the plant will continue to evaluate the information repositories. Arvada supports evaluation of the operations and their use by the public, but we do not support review of their continued use based solely upon funding. Once established, DOE should assure that funding is maintained for all needed and used respositories.*

Response to Comment 15

The only information repositories that receive DOE funding are the Rocky Flats Public Reading Room located in the Front Range Community College Library and the information repository located at the office of the Rocky Flats Environmental Monitoring Council. DOE leases space from Front Range Community College for the Rocky Flats Public Reading Room and staffs the reading room with a full-time librarian. DOE provides documents to the other four information repositories, including the one housed at the office of the Rocky Flats Environmental Monitoring Council, but has no control over how they are maintained or made available to the public.

DOE recognizes the need for continued public access to plant documents and fully intends to maintain the Rocky Flats Public Reading Room for many years. However, the availability of funds for future enhancements to the reading room will be a factor in the consideration of those enhancements.

Comment 16

2. *Arvada supports holding public meetings during the public comment period for each Remedial Action Plan during the middle of the comment period. This would allow interested parties to review the plan, prepare draft comments and modify their final comments based on comments presented at the public comment meetings.*

Response to Comment 16

DOE has held public comment meetings at various times within public comment periods in an effort to determine a schedule that will encourage meaningful public participation and comment. The meeting to receive public comment on the Proposed Interim Measures/Interim Remedial Action Plan for Operable Unit No. 2 (903 Pad, Mound and East Trenches Areas) was held halfway through the public comment period as you have suggested.

In the case of the draft Community Relations Plan, a public information meeting to answer questions about the document was held three weeks into the comment period, and the public comment meeting was held two weeks before the end of the comment period. There are benefits to both methods, and your views are helpful as we weigh the options.

Comment 17

3. *In the Public Comment Opportunities subsection, it states that "the plant may offer additional opportunities for the public to get information through information meetings, workshops, question and answer sessions...". Arvada would like to see information in the final plan outlining what will trigger these extra informational meetings, workshops, etc.*

Response to Comment 17

It is our general practice to offer public information meetings or workshops on all environmental restoration documents that are issued for public comment. Also, DOE may offer information meetings on topics of significant public interest even in the absence of a public comment period on the topic. One recent example of this type of DOE effort is the series of two workshops and one informational meeting conducted with EPA and CDH to address citizen questions about the development of risk assessments for environmental restoration activities. Language has been added to the final plan to more completely explain when information meetings and workshops are provided.

Comment 18

Additional Activities

1. *Arvada supports the preparation of fact sheets and citizen guides. The final plan should outline the means of distribution of these educational aides. There is no reason to prepare these materials if a method of getting them to the public is not in place. Distribution of this information should not be limited to those citizens who show up only at public meetings on Rocky Flats. Rocky Flats should consider advertising in local municipal newspapers that the information is available to the public.*

Response to Comment 18

DOE appreciates your observation that we should seek new audiences in the distribution of our informational materials. We do not rely solely on public meetings for the distribution of fact sheets and informational materials. We also provide fact sheets and similar documents to tour participants and Speakers Bureau audiences and use them in response to written or verbal requests for information from the public. As stated in the draft Community Relations Plan, fact sheets may also be mailed directly to organizations and individuals on the Rocky Flats Plant mailing list.

In an effort to better publicize the topics and availability of fact sheets, the plant periodically will issue a list of fact sheets from which the public can order copies. The list will be mailed to all individuals and organizations on the plant's mailing list and will be provided to the information repositories identified in Appendix D of the Community Relations Plan.

In response to your concern, a discussion of these distribution methods has been added to the final plan within the two discussions of fact sheets in Section E, Community Relations Activities. We will continue to look for other avenues and would appreciate additional suggestions about information dissemination.

COMMENTOR: Howard Brown, Rocky Flats Environmental Monitoring Council

Comment 19

In February 1990, the Rocky Flats Environmental Monitoring Council submitted a set of 52 recommendations to Governor Romer and Congressman Skaggs regarding Rocky Flats. DOE gave preliminary reactions to the recommendations at the Council's March 1990 public meeting, but has never formally responded to them. Several of those recommendations sought improvement of information and public involvement efforts regarding Rocky Flats. On behalf of the Council, I would request that these be accepted as comments on the proposed final Rocky Flats Plant Community Relations Plan - Environmental Restoration Program.

Response to Comment 19

DOE appreciates the Council's recommendations and has implemented many of them. You are correct that DOE has not formally responded to the recommendations. However, as you state above, the Council did not formally submit the recommendations to DOE.

Many of the recommendations submitted as comments on the draft Community Relations Plan do not address environmental restoration and, therefore, are outside the scope of the plan. Nevertheless, a response is provided for each recommendation.

Comment 20

My reading of the plan as written indicates that it does not contain provisions responsive to these recommendations. The recommendations are as follows:

DOE should publish public information papers addressing all plant operation, waste management, environmental restoration and other situations with important health, safety or environmental considerations. These public information papers should clearly and concisely identify issues and alternatives for the regulatory agencies and the public in a timely manner. Quarterly reports updating each of the "open" files also should indicate the current status of negotiations with regulatory agencies regarding these situations. DOE would initiate new issue files as soon as warranted or as requested by the Governor. DOE should address the following specific issues initially.

- *TRU waste storage and disposal*
- *Low-level mixed waste storage and disposal*
- *Liquid mixed waste treatment (TRU and low-level contaminated solvents and oils)*
- *Building 371 upgrading*
- *Wastewater and runoff discharges*
- *Offsite contamination areas*
- *Use of Carbon Tetrachloride, other solvents*

Response to Comment 20

Of the list of suggested topics for information papers, the only one that falls under the purview of the Community Relations Plan is "offsite contamination areas." However, in response to the recommendation, DOE produced fact sheets on all of the suggested topics with the exception of liquid mixed waste treatment during 1990 and 1991. Fact sheets on other topics were produced as well.

In response to the second request, the status of environmental restoration issues, including relevant negotations with regulatory agencies, is addressed in the ***Environmental Restoration Update***, which is published by the plant every other month. The ***Monthly Progress Report on Environmental Restoration*** also offers this type of information in a more detailed and technical format and is available to the public at the five information repositories list in Appendix D of the Community Relations Plan. Lastly, this type of information is provided to the Rocky Flats Environmental Monitoring Council, and subsequently to the public, in monthly reports assembled by DOE, EPA and CDH.

Comment 21

DOE and/or the regulatory agencies should prepare "question and answer sheets" addressing likely citizen questions for issues such as the above, for major cleanup activities, for waste management programs, for regulatory programs and for other issues of public concern. DOE and/or the regulatory agencies also should prepare information sheets on the potential health impacts of the various chemicals used at Rocky Flats or alleged to have been released into the environment.

Response to Comment 21

DOE agrees that the question and answer format for informational materials can be a useful one and will consider it when preparing the fact sheets and citizen guides on environmental restoration provided for in the Community Relations Plan. Information about waste management programs would be addressed more appropriately in a future community relations plan on waste management.

In response to your request that DOE prepare information sheets on the potential health impacts of the various chemicals that may have been released into the environment at Rocky Flats, that information is already made available by chemical manufacturers in the form of Material Safety Data Sheets. Occupational Safety and Health Administration Hazard Communication Standards require that Material Safety Data Sheets be readily accessible to employees who handle chemicals. At Rocky Flats, Material Safety Data Sheets are located at multiple locations within buildings where hazardous chemicals may be used.

DOE is required by the Superfund Amendments and Reauthorization Act, Title III, to make a complete chemical inventory and the associated Material Safety Data Sheets available to the residents of Jefferson County, which is where the plant is located. The required information is located at the Jefferson County Public Library, 10200 West 20th Avenue, Lakewood, Colorado.

In June 1990, DOE provided the Rocky Flats Environmental Monitoring Council with Material Safety Data Sheets for most of the chemicals on the Interagency Agreement list of hazardous substances used at the plant that have been released or that could be released to the environment. In addition, a complete chemical inventory and Material Safety Data Sheets have been provided to CDH, and the chemical inventory is available at the DOE Rocky Flats Public Reading Room.

With respect to environmental restoration in particular, the health impacts of chemicals in soils and/or water will be addressed within the remedial investigation/feasibility study process undertaken for the various operable units.

Comment 22

In developing cleanup strategies and priorities, budget requests, long range plans and other major decision making documents, DOE, EPA and CDH should provide opportunity for public input early enough in the process to be considered in a meaningful fashion.

Response to Comment 22

DOE cannot speak for EPA and CDH in responding to this comment. We can say, however, that DOE solicits public comment on cleanup strategies through the CERCLA process. Each proposed Interim Measures/Interim Remedial Action Plan and Proposed Plan for final remedial action is offered for public review and comment prior to completion.

In addition, DOE, in cooperation with EPA and CDH, formed the Technical Review Group in May 1991, to provide for public involvement in the early stages of remedial investigation work plan development. The Technical Review Group comprises representatives of area municipalities, interest groups, EPA, CDH and the Rocky Flats Plant. The group meets approximately monthly to review work plans and to offer informal feedback to plant and regulatory agency personnel. Please also refer to Response to Comment 14.

DOE also solicits public comment on budget requests and long-range environmental restoration and waste management plans as set forth in DOE's five-year plans for the entire weapons complex. The ***Environmental Restoration and Waste Management Five-Year Plan, Fiscal Years 1993-1997***, was released for public comment in August 1991.

More immediate budget and activity planning is accomplished through DOE's site-specific plans for each fiscal year. The ***Rocky Flats Plant Fiscal Year 1992 Site-Specific Plan*** was released for public comment in September 1991. Comments on the 1992 plan will be considered in the development of the 1993 plan.

Comment 23

DOE should make preliminary information on unplanned events available to CDH, EPA, the Governor, the Colorado and United States representatives for areas around Rocky Flats and the Council and also to the general public in their public reading room within 24 hours regardless of eventual official reporting requirements.

Response to Comment 23

DOE has in place a system for notifying other agencies and governmental bodies of "reportable occurrences" as defined by DOE Order 5000.3A. The occurrence reporting system includes 24-Hour Notification Reports, 10-Day Occurrence Reports and Final Occurrence Reports. Final Occurrence Reports are available for public review in the DOE Rocky Flats Public Reading Room.

DOE has no current plans to place earlier reports of unplanned events in the reading room because they contain extremely preliminary and unconfirmed information and may cause undue concern or alarm in the public.

Comment 24

DOE should establish an electronic bulletin board to provide computer access to these unplanned event reports, to other incident reports, to the public information papers called for in recommendation number one, to a calendar of meetings, hearings and due dates and to other appropriate information. DOE should also establish a voice-activated information system to provide telephone access to appropriate summary information.

Response to Comment 24

DOE agrees that an electronic bulletin board might be beneficial in disseminating certain types of information about Rocky Flats to the general public. However, the effectiveness of the presently utilized communication mechanisms needs to be evaluated prior to making a decision regarding the need for an electronic bulletin board. DOE will consider it as an option for the future if the need is identified and if funding is available.

In the meantime, we are using other mechanisms for providing information about cleanup, including fact sheets, briefings, public meetings, the Rocky Flats Public Reading Room, news releases, newspaper advertising and direct mailings to individuals and organizations on the Rocky Flats mailing list.

DOE has established a telephone line with recorded information on upcoming public meetings and public comment opportunities rather than a voice-activated telephone system for summary information. This method was chosen because the system was already available at the plant and could be implemented immediately. Details about the telephone line have been added to the final Community Relations Plan.

Comment 25

DOE should conduct a review of their document security classification system with two purposes in mind. One would be to explain that system and its necessity to the public. The other would be to identify possible means for reducing the amount of information for which access needs to be restricted. In the meantime, DOE should minimize use of classified or UCNI status for documents which would be of interest to the public.

Response to Comment 25

Very little, if any, information about environmental restoration is classified. Nevertheless, DOE will provide a briefing to the council on the classification system upon request. The DOE Security Classification System, which is based on DOE Orders, U.S. Executive Orders and the Atomic Energy Act, protects information vital to national security. It is not to be invoked to withhold information that would otherwise be made available to the public. DOE periodically reviews old classified documents for declassification, but this is a long process.

Comment 26

The Rocky Flats Plant should make available for the public clear, concise, self-contained descriptions of the activities and their priorities and scheduled completion dates included in its 1990 Five-Year Plan for: a) environmental restoration, b) new initiatives for waste management and c) corrective activities for complying with existing legal requirements.

Response to Comment 26

Neither waste management initiatives nor corrective activities for complying with existing legal requirements fall within the scope of the Community Relations Plan for environmental restoration. The ***Rocky Flats Plant 1991 Site-Specific Plan*** better describes program activities, as do the ***Rocky Flats Plant 1992 Site-Specific Plan*** and the ***Environmental Restoration and Waste Management Five-Year Plan, Fiscal Years 1993-1997.*** The Interagency Agreement contains specific schedule information for environmental restoration activities.

Comment 27

DOE should involve workers in prioritization of environmental restoration activities and in choices of waste management strategies.

Response to Comment 27

Again, comments concerning waste management are not relevant to this document. Certainly employees with expertise in environmental restoration are involved in the technical evaluation of environmental data and remediation technologies. Also, through the plant's Employee Communications Department, workers are informed of current events, available documents and

upcoming public meetings and public comment opportunities on environmental restoration issues. Many workers regularly attend public meetings and offer public comment on plant activities and documents.

Comment 28

In terms of a general characterization, the principal disappointment with the proposed Community Relations Plan is that it makes no firm commitments to providing the general public opportunity for involvement in the early stages - when their input could be most helpful - of developing general policy or specific project plans.

Response to Comment 28

The Community Relations Plan does commit to providing opportunites for early involvement in policy development and project plans for environmental restoration through the establishment of the Technical Review Group. Please also refer to Responses to Comments 14 and 22.

COMMENTOR: Paula Elofson-Gardine, Concerned Health Technicians for a Cleaner Colorado

As the main researcher, director, and spokesperson for Concerned Health Technicians For a Cleaner Colorado, I am compelled to comment on portions of this CRP that are seriously flawed to such an extreme, it boggles the imagination.

Comment 29

One would first ask the DOE and EG&G to consider that those that are the INFORMED PUBLIC are highly incensed by this CRP, as many areas of this report assume little or no knowledge about basic history of this facility and the area around it. It would seem that the DOE has largely relied on this to be true as they have sent site descriptions and characterizations to "experts" in various areas to base their professional judgement upon. This is a real tragedy. An example of this propagation of error is the continual characterization of the plant siting as if it were not nestled in the middle of suburbia! The ***1988 Complex-Wide Environmental Audit*** *is a report that immediately comes to mind as an interesting dichotomy in site characterizations from all over the United States. One wonders if this is "Standard Operating Procedure" for most of the other sites as well. If so, one also wonders just how close to each DOE/DOD facility is the public, REALLY. (e.g.: Lisa Crawford's back fence borders Fernald's facility!)*

Response to Comment 29

Most of the general public is not as familiar as you are with technical details about the plant, so, by design, the historical information in the Community Relations Plan is basic and nontechnical. The plan is intended to provide the reader unfamiliar with the site with a general understanding of the reasons for its inclusion on the Superfund National Priorities List for cleanup.

DOE disagrees that the plan mischaracterizes the plant's location with respect to surrounding communities. The plan states that the plant is located 16 miles from downtown Denver and, as such, is on the fringe of a highly populated metropolitan area. In addition, the closer communities of Boulder, Broomfield, Westminster, Arvada and Golden are identified, and a map of the area showing these communities and others is included.

Comment 30

This underscores the ludicrousness of citing proximity to a facility from the center rather than from the perimeter. If the DOE is genuinely interested in identifying the problems at hand, we would suggest that the referenced proximity be taken from the perimiter of the plant, rather than at the center.

Response to Comment 30

The most statistically and analytically sound method of describing the surrounding population is by doing so in terms of radial distance from the center of the plant's developed area. Choosing a

point on the plant's perimeter from which to measure a radius would be arbitrary and subjective and would make the description unnecessarily complex. Please also refer to Response to Comment 8.

Comment 31

Page 2 cites that the plan is tailored to the needs of the community. What exactly does the DOE/EG&G think the "needs of the community" are?

Response to Comment 31

Very generally, the needs of the community, for the purposes of this document, are information about the plant's environmental restoration process and involvement in decision making, where possible. These needs were identified through an extensive community interview process in which area citizens were asked to identify their concerns about the plant and to suggest mechanisms for public information and involvement. The results of the interviews are discussed in the Community Relations Plan in Section C, Community Background, and in Section D, Objectives. DOE would welcome additional input regarding community needs that may not have been identified in the interview process or addressed in the plan. Please also refer to Response to Comment 12.

Comment 32

Page 3 goes on to cite the CRP activities that would help the public become better informed about environmental cleanup at the plant and ensure early citizen involvement in the decision making process. This describes the EPA TAG program, more specifically the Rocky Flats Cleanup Commission as the TAG group focused on cleanup of the RFP facility. Why wasn't the RFCC more intimately involved with this process, such as panels, public outreach newsletter (regular counter-point column (uncensored)), and debates, public presentations sponsored by any of the agencies involved with the RFP issues: DOE, EG&G, EPA, CDH?

Response to Comment 32

The Rocky Flats Cleanup Commission has been involved in the environmental restoration decision making process through briefings, public comment opportunities and informal meetings between plant personnel and Cleanup Commission members. DOE will continue to offer the Cleanup Commission and all other interest groups and members of the public opportunities for involvement in future decisions about environmental restoration.

Comment 33

In defining the community that the RFP will focus their efforts on for community relations efforts, we are confused. Why exactly is the RFP focusing efforts in such a far-flung manner? The "affected" communities are supposed to be those most immediately surrounding the facility!

Why then does this CRP cite Metro Denver, Arapahoe County, Douglas County, Denver counties, but misses Lakewood, Wheat Ridge, Edgewater and others in closer proximity? The Maximum Credible Accident Scenario considers the more close-in communities as those that are most affected by any incident at this facility. (Northern Jefferson County, Southeastern Boulder County, Arvada, Westminster, Broomfield). Unincorporated Jefferson County is also forgotten, as are close-in subdivisions such as Countryside, Walnut Creek and Leyden.

Response to Comment 33

The plant's community relations efforts are not focused in a far-flung manner. Through the community interview process, the plant identified areas of particular interest in cleanup at Rocky Flats, not just areas that would be considered affected by accidents or incidents at the facility. Although, DOE will respond to public needs wherever those needs happen to be located, we recognize that interest is more concentrated in the communities closer to the plant. The naming of communities in the plan is not all-inclusive, nor is it exclusive. In order to clarify this fact and to meet your concern, the reference to areas of focus has been revised and now includes the cities of Lakewood and Wheat Ridge.

We agree that the subdivisions listed would most likely have an interest in cleanup activities. Rather than identifying numerous subdivisions in the area, the plan identifies the counties and cities in which they are located.

Comment 34

Many important issues of note regarding current waste and environmental restoration issues are handily glossed over, such as what is the current controversy and status with the Solar Evaporation Ponds waste streams leaching into groundwater and migrating in a plume toward off-site areas? What of the PONDCRETE fiasco? We understand that there have been further incidents of spills and problems in solidification of this waste form. The Admiral himself has acknowledged this as a serious deficiency. Why sugarcoat it? What is the current status of waste technologies that are somewhat new and/or controversial, such as the supercompactor, and incineration or thermal processes such as the microwaving of waste (which has been touted as the new and upcoming wave of the future-no pun intended!)? What about the status of the Critical Mass Laboratory? Where does their waste go, and is the effluent, atmospheric or liquid discharge monitored? Where is this data? How many Unusual Occurrences have occurred as a result of these various processes?

Response to Comment 34

A brief discussion of recent problems experienced with the plant's efforts to solidify solar pond sludge has been added to the fianl Community Relations Plan in response to your comment. Please note that the Community Relations Plan, developed according to U.S. Environmental Protection Agency guidance, is not intended to provide a comprehensive history or status of all technical activities at the site. Rather, it provides the basic historical, geographical and technical details necessary for a reader unfamiliar with the site to understand why the site is listed on the Superfund National Priorities List. Detailed information on the plant's past and

current technical activities is available to the public in other documents, such as those listed in Appendix H, References, in the Community Relations Plan. These documents are available at the DOE Rocky Flats Public Reading Room.

In addition, the waste management issues to which you refer are not within the environmental restoration scope of the Community Relations Plan. Waste issues would be more appropriately addressed in a future plan on waste management.

Comment 35

Since many others have commented on specifics about the adequacy and problems of the site description, we will defer to their testimony.

There is serious concern about the Plant History section that starts on page 4, running through most of page 8. The 1957 fire is cited as the "first significant event of public interest... explosion of flammable vapors..."May" have contributed to a release of plutonium from the building." This section goes on to cite an estimated release of 25,618 microcuries of plutonium. This is an outright falsity at best, in examining even minimal records of this incident. Please refer to the following documents:

> *Denver Post FOI request on 1957 and 1969 fires, Search results from Legal Database.*
>
> *United States District Court Civil Action #75-M-1111 Good versus Church, Dow, Rockwell, and U.S. Government.*
>
> *United States District Court Civil Action #75-M-1162 Church and Ackard, Butler, Butler Investments versus United States of America, Dow, Rockwell.*
>
> *United States District Court Civil Action #75-M-1296 Great Western Venture versus United States of America, Dow, Rockwell.*
>
> *An Assessment of Criticality Safety at Department of Energy Rocky Flats Plant, Golden, CO, July-September 1989, SCIE-DOE-201-89. (appendix M-internal memos)*
>
> *Plutonium and Other Transuranium Elements: Sources, Environmental Distribution and Biomedical Effects. Wash-1359, USAEC. (tables 4,5)*
>
> *Rocky Flats Health Physics Report, Radioactive Materials Associated with Rocky Flats Plant, Monthly Information Exchange Meeting. (re: types of radioisotopes at RFP and types of radiation emitted)*
>
> *Rocky Flats Plant Reports as below:*
>
> *RFP 3914, Dust Transport-Wind Blown and Mechanical Resuspension. 7/83-12/84*
>
> *RFP 2901, Soil Decontamination at Rocky Flats Plant.*

EPA 520/4-77-016, Proposed Guidance on Dose Limits for Persons Exposed to Transuranium Elements in the General Environment.

Plutonium 239 and Americium 241 Contamination in the Denver Area. Health Physics Vol. 23, pp. 437-548, Oct. 1972.

Plutonium in the Soil Around Rocky Flats Plant. USAEC Report, HASL-235, 1970, by P.W. Krey and E.P. Hardy.

Comments on the 1957 Fire at the Rocky Flats Plant, in Jefferson County, Colorado. Carl J. Johnson, MD, MPH, Conference on the Relation of Environmental Pollution to the Cancer Problem in Colorado, American Medical Center Cancer Research Center and Hospital, Lakewood, Colorado, September 26, 1980.

Contamination of Municipal Water Supplies in the Denver Metropolitan Area by the Rocky Flats Plutonium Plant. American Journal of Epidemiology, Vol. 125, Number 2, 1987.

Plutonium Hazard in Respirable Dust on the Surface of Soil. Science, August 6, 1976.

In the comments on the 1957 fire, there is sufficient compelling evidence presented, that this claim of only releasing 25,618 microcuries of plutonium is really pathetic. If the monitoring were suspended and/or disabled until 8 days after the fire, then registered 13,000 microcuries for a one-day release (an excess release of 16,000 times the daily release guidelines at the time), it doesn't take Einstein to extrapolate that this amount would be orders of magnitude LESS than that on the first, second, and many subsequent days after the fire. The HEPA filter plutonium (radioisotope) loading and ductwork holdup is not taken into consideration in "reported releases". The estimation of this contribution, based on RFP data, indicates that at the time of the 1957 fire, was a potential whopping 250 kilograms of plutonium burned up and released to the local environment and public.

Response to Comment 35

The discussion of the 1957 and 1969 fires has been revised in the final plan to indicate that the estimated releases are DOE estimates that others, including Dr. Carl Johnson, claim are too low.

Comment 36

The reported releases from the 1969 fire are equally suspect, with claims of being "confined to plantsite" a joke. The environmental evidence cited in the above reports is such that MINIMALLY, there at least 14 curies of plutonium in the environs around the RFP, not to mention the unfortunate residents "downwind" in the windroses of all of the incidents at the RFP. The reports by Krey and Hardy, and Poet and Martell, indicated that the reported releases were ORDERS OF MAGNITUDE too small, when the environmental evidence was examined.

Response to Comment 36

The above-referenced report by Krey and Hardy provides the following conclusions on page 35:

> "The May 11, 1969 fire can be exonerated as the source [for plutonium in soil around the Rocky Flats Plant] because the winds that day were almost directly opposite to the contamination pattern leaving the plant site. The detection of plutonium at 13 cm below the soil surface would further tend to rule out a significant contribution from this event. The September 11, 1957 fire can not be eliminated on the basis of the winds at the time of that fire. However, the particle size of the dioxide from burning plutonium is estimated to be sub-micron. The sharp gradient and relatively short downwind extent of the contours in Figure 5 are not compatible with deposition of sub-micron particles."
>
> "There are several observations about the plutonium distribution which link the contamination to the leaking barrels [at the 903 Pad area]."

Please also refer to Response to Comment 35.

Comment 37

There needs to be an accurate accounting of releases from Unusual Occurrences, Unplanned Events, and DAILY RELEASES from the RFP.

Response to Comment 37

Any releases of radioactive or hazardous materials from the plant into the air, water or soil will be identified through the plant's extensive environmental monitoring program. Releases also will be identified through the environmental monitoring conducted by CDH and the cities of Broomfield and Westminster. Environmental monitoring data are presented and compared among the agencies and cities each month at a public meeting. Please also refer to Response to Comment 23.

Comment 38

The sediment studies section cited that sediments are contaminated, but buried by noncontaminated sediment, so are perfectly safe. These reservoirs are usually monitored for gross alpha, beta, not isotope specific measurements. There is also a phenomenon known as lake turnover that should be kept in mind, that occurs twice a year at least, that contributes to the redistribution of the contamination, potentially contaminating the public that recreate in the area.

Response to Comment 38

The plan does not state that the sediments are perfectly safe. Instead, the plan states that studies of the sediments in Standley Lake and Great Western Reservoir indicate that water quality has not been measurably affected.

The reservoirs are monitored regularly for isotopic specific measurements. The plant draws water samples from Great Western Reservoir and Standley Lake every month and analyzes them for plutonium-239,-240; americium-241; uranium-233,-234; uranium-238; and tritium. The results are published and reported to the public on the last Tuesday of each month at the Monthly Exchange of Information Meeting.

Lastly, the plant is aware of the natural process called lake turnover, which can occur in the spring and fall seasons. It is unlikely that the process would disturb the contaminated sediment layer, which has been buried by the continuous deposition of uncontaminated sediments. Nevertheless, DOE plans to investigate the phenomenon further as part of the work plan for Operable Unit No. 3, the offsite areas identified for environmental restoration.

Comment 39

The next paragraph on page 8 cites that the 903 pad area was a problem, but the resuspension has been controlled after the pad was installed. This is an outright falsity, demonstrated by the above report on the resuspension studies done at the RFP by Dr. Gerhard Langer. Resuspension is known to be a serious problem in this area, with concentrations between 4,840-8,140 disintegrations per minute in the grass and soil near the EAST GATE! The above studies in addition to the Radioecology and Airborne Pathway Report done by Dr. George Setlock quantified that greater than 50% of the resuspended particles have a static nature, and are known to attach to litter in the local environs. The unrelenting migration in the environment and uptake in the ecosystem of these long-lived radioisotopes are of extreme hazard and concern to the public, and should be acknowledged as such.

Response to Comment 39

The Community Relations Plan's discussion of contamination at the 903 Pad area has been revised to reflect that not all of the plutonium-contaminated soil was removed before the pad was put in place and that some residual soil contamination still exists both onsite and offsite as a result of historical activities there.

The onsite and offsite residual contamination is receiving attention from the plant and our regulators. Where applicable, onsite construction projects must comply with dust control procedures to minimize the resuspension of plutonium particles and to mitigate potential consequences of resuspension.

Offsite residual contamination is being assessed by the plant as part of our environmental restoration program. Environmental assessment of the offsite areas is a high priority project

for the plant. In fact, out of the plant's sixteen contaminated areas identified for investigation and cleanup, the offsite areas are ranked third in terms of priority.

Comment 40

The paragraphs citing the tritium incident are equally disgusting in their mischaracterization of past incidences. The ***Contamination of Municipal Water Supplies in the Denver Metropolitan Area by the Rocky Flats Plutonium Plant*** *report from the American Journal of Epidemiology cited that the amount of plutonium in Walnut Creek alone was found to be 286,000 times background, with the tritium release resulting in the contamination of Broomfield residents to such a degree that their urine was found to contain as much as 8,100 picocuries per liter of tritium. Tap water was found to contain as much as 18,780 picocuries per liter of tritium. In light of this information, the characterization of the problem seems rather trite, doesn't it?*

Response to Comment 40

To put the tritium concentrations cited in perspective, the current state standard for tritium in drinking water is 20,000 picocuries per liter. DOE was certainly concerned about the release of tritium into Walnut Creek in 1973 and developed mechanisms for preventing future releases. We do not view the 1973 incident as trivial or trite, which is why the Community Relations Plan identifies it among other major incidents in the plant's history.

Comment 41

The subsequent sections that cite pro-nuclear rallies to counter the impression of public opposition from antinuclear rallies and activities is rather curious, with no one seeming to be able to find any data to verify this. Was this an employee-family outing intended to bolster their spirits? Please provide data to confirm this rally cited.

Response to Comment 41

The draft Community Relations Plan identifies only one pro-nuclear rally, although perhaps more have occurred. The reason for including it in the discussion of past community involvement is not to counter the impression of public opposition but, rather, to show that Rocky Flats has been the focus of attention from a variety of perspectives through the years.

The rally, which was held on August 26, 1979, was covered by the local news media and reported in the major newspapers. According to newspaper accounts, much of the groundwork for the rally was done by plant employees on their own time. Also according to these accounts, about half of the participants were workers, retirees or families of workers. Speakers at the rally included Peter Brennan, former Secretary of Labor; Michael May, associate director-at-large of the Lawrence Livermore Laboratories at the University of California; John Stoessinger, professor of political science at the City University of New York; Llewellyn King, editor of the

Energy Daily; Petr Beckman, professor of electrical engineering at the University of Colorado; and Juliete Zivic, president of Americans for More Power Sources.

Comment 42

Through the years, that the RFP responded to public interest in a variety of ways is certainly true, but usually we were told to "to fish" for documents through the Freedom of Information Act provisions, delaying documents as much as one year! Is this a cooperative PR department? I don't think so.

Response to Comment 42

DOE hopes that problems with general document availability are an issue of the past. Our efforts to improve public access to information over the last two years include establishing the Rocky Flats Public Reading Room, conducting dozens of public meetings, providing monthly briefings for local governments, expanding our Speakers Bureau and public tour programs and providing staff dedicated to the community and media relations functions of responding to inquiries and requests for information.

In addition, DOE provides copies of documents to members of the public on a regular basis, often without a specific request. For example, we automatically send 10 copies of each IAG-required public comment document to the Rocky Flats Cleanup Commission upon its availability according to an agreement with the Cleanup Commission. We believe that there is always room for improvement, however, and would appreciate specific suggestions from members of the public.

Comment 43

Please provide a list of Speakers Bureau activities. We have requested an accounting of these activities, along with the opportunity to attend and/or respond in a counterpoint style.

Response to Comment 43

The Rocky Flats Plant offers speakers to civic organizations, professional societies, neighborhood associations, churches, schools and other similar citizen groups at their invitation. It is not appropriate for DOE to invite other organizations to participate in Speakers Bureau activities as we are guests ourselves. We assume that the groups will arrange for a point-counterpoint type of presentation if that is what they seek.

Comment 44

The Administrative Record issue is one that needs attention. If one must make an appointment to get into the RFEMC Administrative Record room, it isn't very open, is it?

Response to Comment 44

The Administrative Record for plant cleanup activities is available for public review at several locations, not just at the Rocky Flats Environmental Monitoring Council office. The Administrative Record is accessible at CDH and at EPA's Region VIII Superfund Records Center during normal business hours and at the DOE Rocky Flats Public Reading Room during weekdays and two evenings a week.

Comment 45

Finally, we would like to clarify that we would like to see the Rocky Flats Plant cleaned up to the greatest extent possible, stabilized, and made unavailable for any further development and/or use, not just stabilized and left! The economic contribution of the RFP is only just beginning, as the lawsuits will roll in, workman's comp awarded, cancers developing, chromosome abberations quantified. There are other areas in the U.S. that have closed facilities such as this with more positive input to the community. There can be a transition for workers into the private sector, with the input into new businesses, covered for the rest of their lives by the Superfund for Workers on health and insurance. Let's quit using scare tactics on the workers and the public, when the reality is that the Environmental Restoration of this facility will take DECADES!! In the meantime, the RFP should not be allowed to continue to operate, with continued radiotoxic emissions, as you cannot have cleanup while new fallout and emissions are occurring.

Response to Comment 45

DOE believes that environmental restoration of the plant can be accomplished successfully during production operations. Future use of the plantsite after production operations cease is still being considered in long-range planning documents. The DOE Defense Programs Complex-Wide Modernization Environmental Impact Statement will analyze and establish a decision on the long-range future of the Rocky Flats Plant for the production mission.

COMMENTOR: Jean Jacobus, Jefferson County Attorney's Office

On behalf of Jefferson County, I would like to thank the Department of Energy (DOE) for the opportunity to submit comments on the draft Rocky Flats Community Relations Plan. Jefferson County was a participant in the community interview program and feels that many of the County's concerns have been identified and acknowledged by the Department of Energy (DOE) through that process.

Jefferson County recognizes that many activities listed in the Community Relations Plan have already been implemented. These efforts have improved the County's accessibility to information concerning various Rocky Flats issues. Specific programs or activities that now have been implemented and that are helpful for Jefferson County are:

- *the monthly EG&G briefings for the local jurisdictions on environmental restoration;*
- *the assignment of a single person within the Community Relations group as Jefferson County's primary contact;*
- *the commitment to follow through on requests, and the efforts made to initiate contact with Jefferson County on a regular basis; and*
- *the creation of the Speakers' Bureau and the site tours.*

Jefferson County does have, however, some specific concerns with several items in the draft plan. The following items need to be addressed and/or corrected before the Community Relations Plan is finalized.

Comment 46

COMMUNITY PROFILE, page 13.

1. *Demographics: The 1990 Census data, data available from the Jefferson County Planning Department, and from cities in the immediate area, are more current than the 1989 Denver Regional Council of Governments data cited. Jefferson County suggests that these sources be consulted and the population figures on page 13 be revised to reflect more accurately the current data.*

Response to Comment 46

According to the U.S. Census Bureau and the Jefferson County Planning Department, only segments of the 1990 census data are available. The data have not yet been compiled in a form that would provide population totals in radial distances from the plant. DOE will revise the population figures, using 1990 census data, in future updates to the Community Relations Plan.

Comment 47

2. *Commercial Development: The paragraph on commercial land use does not mention the industrial facilities located on Highway 72 directly south of the plant. This industrial*

area, a portion of which is named the Rocky Flats Industrial Park, covers approximately 115 acres. Notation of this industrial land use should be added to the commentary.

Response to Comment 47

The discussion of commercial development near the plant has been revised in the final plan to include the Rocky Flats Industrial Park and Jefferson Center. Please also refer to Response to Comment 7.

Comment 48

3. *Paragraph #4: The paragraph which begins "The area immediately surrounding the plant..." could lead readers to believe that most or all of the area within a 10-mile radius is currently in agricultural use. The wording should be clarified to accurately reflect the various land uses within 10 miles of the plant.*

Response to Comment 48

The paragraph has been revised in the final plan to indicate that the area within 10 miles of the plant is used for agricultural, residential and commercial purposes.

Comment 49

4. *W-470: The paragraph on W-470 should be updated. Jefferson County suggests the following language:*

> *The plant is near proposed alignments for the northwestern segment of a beltway around Denver. A tollroad proposed by the W-470 Authority would pass along the western boundary of the plant. Controversy over this proposed tollroad has been mitigated by the Authority's decision to eliminate an eastern alignment.*
>
> *Alternative proposals to the tollroad involve upgrading existing free highways, including State Highway 93. The most recent alternative -- the Northwest Parkway -- is proposed as part of a regional transportation package that must be approved by the legislature and the voters in the six-county Denver metro region. This alternative includes stringent land use restrictions and open space requirements. No decision has been made on the various options. However, none of the options would preclude future development near the plant.*

Response to Comment 49

The suggested language has been incorporated into the final plan with minor changes.

Comment 50

FIGURE 5 - LAND USE MAP, page 14.

The map on page 14 does not accurately represent the current land use, although the title of the map is "Land Use in the Vicinity of the Rocky Flats Plant". The map may have been intended to indicate the current zoning, or the current plan for future land uses. Jefferson County is willing to assist the Department of Energy in its efforts to prepare a map to meet the needs of the Community Relations Plan.

Response to Comment 50

The map included in the final plan has been changed to reflect current land use and is so labeled.

Comment 51

JEFFERSON COUNTY SETTLEMENT AGREEMENT PROPERTY, page 16.

While DOE committed to remediate the land described in the settlement agreement, the remediation has not as yet been accomplished. Jefferson County believes that accuracy and fairness dictate that the following sentence be inserted preceding the last sentence on page 16:

> *To date, the required remediation has not been completed.*

Response to Comment 51

A similar statement of clarification about the current remediation activities of the settlement property has been added to the final plan.

Comment 52

TECHNICAL REVIEW GROUP, page 32.

The proposed Technical Review Group needs to be implemented immediately. Although a technical review group is not required under the Comprehensive Response, Compensation and Liability Act (CERCLA), the Department of Energy, the U.S. Environmental Protection Agency, and the Colorado Department of Health have made a commitment to establish this group. This process should begin immediately rather than waiting until the final Community Relations Plan is completed.

Response to Comment 52

The Technical Review Group was established in May 1991, and the initial meeting was held on June 11, 1991. Please also refer to Responses to Comments 14, 22 and 28.

Comment 53

APPENDIX E.

Appendix E lists public comment periods for various documents issued during the cleanup process. However, there is no mention of Operable Unit 3 (OU 3). Surely there will be documents issued on this operable unit and opportunities for the public to comment on these documents. Documents related to OU 3 should be added to Appendix E and the appropriate comment periods listed.

On behalf of Jefferson County, I commend the community relations staffs of both DOE/Rocky Flats and EG&G on the preparation of the draft Community Relations Plan. Jefferson County appreciates the opportunity to comment on the plan.

Response to Comment 53

The Interagency Agreement calls for the development of a RCRA Facility Investigation/Remedial Investigation (RFI/RI) for Operable Unit No. 3. Public comment is not received on an RFI/RI. Based on the RFI/RI, DOE will prepare a Proposed Plan, which will undergo public review and comment. Because the current IAG milestone schedule does not extend beyond development of the Final Phase I RFI/RI Report, a schedule for future public comment is not included in Appendix E.

Meantime, documents related to Operable Unit No. 3 will be provided to the newly formed Technical Review Group for comment and consideration. Please also refer to Response to Comment 52.

COMMENTOR: Melinda Kassen, Environmental Defense Fund

I have reviewed the draft Community Relations Plan (CRP) referenced above and have one general comment in addition to some page-specific comments.

Comment 54

At the March 1991 Rocky Flats Environmental Monitoring Council meeting, you [Beth Brainard, DOE Rocky Flats Public Affairs Officer] briefed the Council and audience on the status of public participation opportunities, noting the myriad of available forums in which the interested individual can express him or herself. While this plethora of meetings may be a sign that the plant is opening up to the public, it is not necessarily being done in a way to encourage meaningful public participation. The situation reminds me of what it is like to litigate against the federal government, where so frequently, one is likely to be buried in documents if one is so bold as to seek discovery.

Meetings need to be spaced. There is, for example, no reason of which I am aware that the plant had to schedule two EIS scoping hearings within a week of each other. The Reconfiguration scoping period lasts through late summer; why did DOE schedule the Denver hearing five days before the plant's site-specific scoping hearing? If one were cynical, one might think that it was a deliberate attempt to force the citizen activists to divide their attentions and not be able to rally for either affair. Or, one might easily suspect that the multitude of meetings designed for the general public is aimed at creating burn out among citizen activists.

Response to Comment 54

DOE agrees that public meetings should be spaced in order to foster meaningful participation from all parties involved. The recent flood of public meetings was not ideal for the plant nor the public and was not an attempt to dilute their effectiveness. Instead, it was the unfortunate result of concurrent projects underway by DOE Headquarters and DOE Rocky Flats. Fortunately, the public comment periods for the meeting topics extended for several weeks after the meetings, and citizens who were unable to provide comments orally could do so in writing at a later time. Nevertheless, DOE will try to avoid such an aggressive meeting schedule in the future.

Comment 55

The CRP must design public involvement to take advantage of those interested members of the public who are voluntarily reading documents in the hope of commenting thereon. This means allowing adequate time between related hearings and meetings. It may mean, as Jill [Jill Paukert, EG&G Community Relations Plan Information Coordinator] and I discussed when she originally interviewed me and again earlier this week when she, Dave Simonson [DOE Assistant Manager for Environmental Management], Barbara Barry [CDH Manager of the Rocky Flats Program Unit] and I talked about the prioritization efforts, establishing focused citizen/community advisory groups on specific topics. All one has to do is look at your list on p. 27 of public comment opportunities to see that the potential exists for poor, or inadequately

prepared, input. That cannot help DOE do its job better or increase DOE's credibility in the community (nor can it be good for your office's morale, if you are the ones spending the time setting these meetings up). There must be alternatives. While the draft CRP reports that certain individuals who were interviewed made these types of suggestions, there is no indication that DOE and its contractor/operator intends to implement them, at least in the context of the CRP.

Response to Comment 55

An initial effort in this direction is the establishment of the Technical Review Group, which will participate in environmental restoration work plan scoping and review. As the Technical Review Group evolves, DOE will explore the possibility of expanding its scope to address other topics. DOE will also consider forming similar groups as you suggest if we receive indications of significant interest among community members for this type of involvement. Please also refer to Responses to Comments 14, 22, 28 and 52.

Comment 56

The CRP does not address DOE's effort nationally to prioritize environmental restoration activities. While I believe your response would be that this national effort is by its very nature outside the scope of a single facility's CRP, I would strongly urge you to rethink whether there may be a way to include within the CRP's mission the education of the public so that the public will understand, and (perhaps) be helpful in reordering priorities if Rocky Flats does not receive sufficient funding to comply with the mandates of the Interagency Agreement. As you are probably aware, and regardless of how DOE characterizes what happened, the State of Washington and its citizens believe that DOE unilaterally reneged on an IAG commitment at the Hanford Reservation, causing major damage to any good will DOE may have garnered by entering into the agreement initially. If there are ways to use the CRP to keep these sorts of misunderstandings from happening here, then do it.

Response to Comment 56

Every activity described in the Community Relations Plan has a public education component, and DOE would welcome your specific comments on how to further this goal. If the environmental restoration priorities have to be reordered because of funding inadequacies, DOE will provide for public input into the process. Additionally, any reordering would involve EPA and CDH because of its effects on implementation of the Interagency Agreement.

Comment 57

The following are some page-specific comments:

p. 7: "The total estimated release of plutonium from the fire was 25,618 microcuries."

As you know, there is a great deal of controversy surrounding this figure. At the very least, the CRP can say only that "DOE's own estimate is that the fire released 25,618 microcuries, although others claim DOE's estimate is low."

Response to Comment 57

Please refer to Responses to Comments 35 and 36.

Comment 58

p. 8: "...all tritium deposited in Great Western Reservoir has since decayed to levels found naturally in the environment."

While tritium does have only a 12-year half-life, most scientists take the position that it takes 10 half-lives for a radioactive element to decay back to what it was naturally in the environment. This statement is erroneous and you should amend the CRP accordingly.

Response to Comment 58

The statement has been revised in the final Community Relations Plan per your comment.

The ***1989 Rocky Flats Plant Environmental Report***, which summarizes environmental monitoring results for the year, provides data on tritium concentrations in Standley Lake and Great Western Reservoir. According to the report, the average tritium concentration in Standley Lake for 1989, based on 51 analyses, was 0 ± 150 picocuries per liter. The average concentration for Great Western Reservoir, also based on 51 analyses, was 10 ± 30 picocuries per liter. These concentrations are well below the current state standard for tritium in drinking water, which is 20,000 picocuries per liter. Please also refer to Response to Comment 40.

Comment 59

p. 9: "plutonium particles can barely penetrate the skin's surface..."

It is the alpha radiation emitted by plutonium particles, not the particles themselves that don't penetrate the skin.

Response to Comment 59

The description of plutonium has been corrected in the final plan to reflect your comment.

Comment 60

p. 9: "...current plutonium operations are carefully controlled to ensure worker and public safety and protection of the environment."

While I appreciate that you feel that DOE and its M&O contractor are doing a good job of ensuring safety, the Conway Board [Defense Nuclear Facilities Safety Board] and Ahearne Committee [Advisory Committee on Nuclear Facility Safety] do not necessarily agree. How about, "DOE and the plant operator have increased their efforts to control carefully plutonium operations to ensure..."

Response to Comment 60

The statement about plutonium operations has been revised in the final plan in response to your comment.

Comment 61

p. 11: "...the groundwater contamination has not migrated beyond the plant's boundaries."

While this statement is true as far as its goes (present monitoring data have not shown off-site groundwater contamination), it may give a mistaken impression because it is incomplete. For example, some of the data from the 903 Pad Interim Remedial Action Plan and supporting documentation seem to indicate that there is at least one well close to the plant boundary that has substantial organic compound contamination. The CRP should augment this sentence to reveal how close some of the groundwater is to migrating off-site. Giving out that information then supports DOE's having begun an interim remediation.

Response to Comment 61

The groundwater monitoring well you reference, No. 3986, is located nearly three-quarters of a mile (3300 feet) inside the eastern boundary of the plant's buffer zone. Only one of the seventeen samples taken from that well between 1987 and 1991 showed abnormally high levels of carbon tetrachloride, a volatile organic chemical. The abnormality of the sample calls to question its technical validity. Nonetheless, five additional monitoring wells will be drilled in that area of the buffer zone to further investigate the groundwater. Please also refer to Response to Comment 5.

Comment 62

p. 17: "To date, no indictments have been issued as a result of the investigation. However,..."

This implies that the criminal investigation ended without issuance of indictments. That is incorrect. The CRP should state that the investigation is ongoing.

Response to Comment 62

Language indicating that the investigation is still underway has been added to the final plan.

Comment 63

p. 17: The chronology ends with the raid, the Tiger Team Report and Rocky Flats' response thereto. Surely, it is important, even in an Environmental Restoration Document, to note that the Secretary suspended plutonium operations in December 1989, which operations have yet to resume. Similarly, given that the CRP does mention the existence of the Conway Board [Defense Nuclear Facilities Safety Board] and Ahearne Committee [Advisory Committee on Nuclear Facility Safety], the CRP should reveal that these bodies have issued their own recommendations having to do with safety and compliance with environmental laws.

Response to Comment 63

Please refer to Response to Comment 3.

Comment 64

p. 25 News Releases. During the first half of 1990, the Plant routinely issued news releases after 5 p.m. (and all too often on Friday). While this has improved, to allow for citizen groups to respond to media requests based on late-breaking news releases from the plant, the Public Affairs Office should try to ensure that citizen groups and other entities likely to be asked for media responses (e.g., the enforcement agencies or local governments) receive the releases at the same time or immediately after the media do.

I hope these are useful and look forward to seeing the final product.

Response to Comment 64

DOE was made aware of the problems experienced by citizen groups when news releases were issued late in the afternoons, and, as you have noted, we have made a sincere effort to issue news releases earlier in the day whenever possible. In addition, for the last several months we have provided EPA, CDH, local municipalities, the Rocky Flats Cleanup Commission, the Rocky Flats Environmental Monitoring Council and the American Friends Service Committee with news releases concurrently with dissemination to the media. The news releases are sent via facsimile as requested by these agencies and organizations.

The draft Community Relations Plan states that interested groups can be included on the news releases distribution list by contacting the Community Relations Plan Information Coordinator. Groups that do not have the technology to receive facsimiles will receive the news releases through regular mail.

COMMENTOR: Ken Korkia, Rocky Flats Cleanup Commission

Enclosed please find our comments on the draft Community Relations Plan. In your response to our comments we would appreciate that you consider each individually and respond to them in a similar fashion. We thank you for the opportunity to respond to this plan, which we feel is vitally important in defining the working relationship between us. We look forward to continuing this relationship and building upon it for a cooperative future.

Comment 65

1) The Rocky Flats Cleanup Commission would like to see the "Rocky Flats Update" have an open editorial whereby other opinions or comments regarding cleanup activities might be included. As the official TAG group we would like to have regular input into this publication.

Response to Comment 65

It is DOE's position that the ***Environmental Restoration Update*** should reflect the official plant statement on environmental restoration. The update is basically a status report on cleanup activities, not a forum for DOE or others to air their opinions, positive or negative, about the plant's efforts in this area. There are numerous other avenues available to citizens for the expression of opinions or comments on environmental issues.

Comment 66

2) The Rocky Flats Cleanup Commission encourages the formation of the Technical Review Committee and would like to become an integral part of it. We would suggest that the public be involved in the selection process of who should sit on this committee.

Response to Comment 66

DOE welcomes the participation of the Cleanup Commission in the Technical Review Group. We appreciate your desire for public involvement in the selection process. However, DOE, with concurrence from EPA and CDH, felt that a Technical Review Group created in a public selection process might not reflect the widest spectrum of the public possible while maintaining the technical basis necessary for remedial investigation work plan development and review. Instead, the agencies worked together to form a group that represents a range of perspectives and offers the necessary technical expertise. Please also refer to Responses to Comments 14, 22, 28, 52 and 55.

Comment 67

3) A dispute resolution process for the public would be a valuable addition to the Community Relations Plan as a means to avoid lawsuits. Currently, the only recourse for citizens to resolve their disputes with any action or procedure at the RFP is by such

suits. We would like to circumvent that problem by recommending a formal dispute resolution process that would involve the public. We anticipate that this process would be similar to the dispute resolution method used by EPA, CDH, and DOE.

Response to Comment 67

Under the Interagency Agreement and the environmental statutes and regulations governing the cleanup of Rocky Flats, it is the responsibility of DOE, EPA and CDH to make final decisions regarding cleanup. DOE is willing, however, to work with the Cleanup Commission in developing alternative methods of issue resolution. This topic was raised by directors of the Cleanup Commission at the public comment meeting on the draft Community Relations Plan, and DOE requested the Cleanup Commission to develop some specific ideas on the membership and role of a dispute resolution committee for citizens. At a minimum, DOE and the regulatory agencies agree to be open and informative about the decisions and to meet with citizens who disagree with the decisions.

Comment 68

4) A formal review process needs to be added to the CRP beyond that described on page 31 of the draft document. We would like to see at least an annual review process with input from the public. Since this CRP is in its "infant" stage, the review procedure should begin sooner than after two years as described in the plan to allow for evaluation and correction earlier in the process.

Response to Comment 68

As required by EPA, the Community Relations Plan will be reviewed at least every two years. If issues arise that bring about a need to revise the plan more frequently, we will do so. DOE considers the plan a dynamic document, and we will continue to consider public needs and requests throughout its implementation.

Comment 69

5) The speakers program mentioned on page 33 should be coordinated to provide public input in a point-counterpoint type of format. Please provide a list of Speakers Bureau activities, along with the opportunity to attend and/or respond.

Response to Comment 69

Please refer to Response to Comment 43.

Comment 70

6) *The Administrative Record needs to be completed and available in the repositories as soon as possible. Twenty-four hour availability would be ideal, or at least include hours when the average working person could use them, say 8:00 a.m. - 10:00 p.m.*

Response to Comment 70

Please refer to Response to Comment 44.

Comment 71

Additional Comments:

7) *One would first ask the DOE and EG&G to consider that those who are the informed public are highly incensed by the CRP, as many areas of the report assume little to no knowledge about basic history of this facility and the area around it. An example of this propagation of error is the continual characterization of the plant siting as if it were not nestled in the middle of suburbia. If the DOE is genuinely interested in identifying the problems at hand, we would suggest that the referenced proximity be taken from the perimeter of the plant, rather than the center.*

Response to Comment 71

Please refer to Responses to Comments 29 and 30.

Comment 72

8) *Page 3, par.2: You need to include Wheat Ridge, Lakewood, Edgewater, unincorporated Jefferson County, as well as the close-in subdivisions such as Countryside, Walnut Creek and Leyden in your list of the defined community.*

Response to Comment 72

Please refer to Response to Comment 33.

Comment 73

9) *Page 4, part B: Because potential pollution may be both waterborne as well as airborne from Rocky Flats, we recommend that you describe the area relative to the prevailing winds, that you describe which cities are in the predominant downwind corridor, and that you provide a map showing, perhaps, a rose diagram of wind directions with an outline of the cities downwind and an explanation on how to read it.*

Response to Comment 73

The information you describe is available in other public documents, including the ***1989 Rocky Flats Plant Site Environmental Report*** and the ***Rocky Flats Plant Monthly Environmental Monitoring Reports***. These documents are available at the information repositories listed in Appendix D of the final Community Relations Plan.

Comment 74

10) Page 7, par. 7: The explosion and fire of 1957 released plutonium off-site. This paragraph needs to say so, especially since the following paragraphs, which describe a separate "significant fire," indicate that plutonium was not released offsite from the fire. If the monitoring was suspended and/or disabled until eight days after the fire, then registered 13,000 microcuries for a one day release (an excess release of 16,000 times the daily release guidelines at the time), it would not be difficult to extrapolate that this amount would be orders of magnitude less than that on the first, second, and many subsequent days after the fire.

Response to Comment 74

Please refer to Responses to Comments 35, 36 and 57.

Comment 75

11) Page 7, par. 8: The reported releases from the 1969 fire are equally suspect, with claims of being "confined to plantsite." The reports by Krey and Hardy, and Poet and Martell, indicated that the reported releases were orders of magnitude too small when the environmental evidence was examined.

Response to Comment 75

Please refer to Responses to Comments 35, 36, 57 and 74.

Comment 76

12) There needs to be an accurate accounting of releases from Unusual Occurrences, Unplanned Events, and Daily Releases from the plant.

Response to Comment 76

Please refer to Responses to Comments 23 and 37.

Comment 77

13) Page 9, par. 2: You might view plowing as a short-term solution, but it is unacceptable. The long-term situation will be that soil presently covering Rocky Flats will be eroded, including the contaminated soil.

Response to Comment 77

DOE assumes that you are referring to the remediation of land east of the plant that was the subject of a lawsuit filed in 1975 by owners of the land. The remediation method outlined by the courts in the settlement agreement involves turning under the top layer of soil, which contains small amounts of plutonium. The turned soil is then seeded with grass to control erosion.

DOE will evaluate this remediation effort as part of our remedial investigation of Operable Unit No. 3, the offsite contamination areas. Following the development of a RCRA Facility Investigation/Remedial Investigation for this area, DOE will prepare a Proposed Plan concerning final action and will issue it for public comment.

Comment 78

14) Page 8, par. 2: When speaking of sediments in the lakes one should keep in mind the phenomenon known as lake turnover that occurs twice a year at least, and contributes to the redistribution of the contamination, potentially contaminating the public that recreate in the area.

Response to Comment 78

Please refer to Response to Comment 38.

Comment 79

15) Page 8, par. 3, cites that the 903 pad area was a problem, but the resuspension had been controlled after the pad was installed. This is an outright falsity, demonstrated by the report on the resuspension studies done at the RFP by Dr. Gerhard Langer. Resuspension is known to be a serious problem in the area, with concentrations between 4,840 - 8,140 disintegrations per minute in the grass and soil near the east gate. Studies by Dr. George Setlock (Radioecology and Airborne Pathway Report) and others have quantified that greater than 50% of the resuspended particles have a static nature, and are known to attach to litter in the local environs. The unrelenting migration in the environment and uptake in the ecosystem of these long-lived radioisotopes are of extreme hazard and concern to the public, and should be acknowledged as such.

Response to Comment 79

Please refer to Response to Comment 39.

Comment 80

16) Page 8, par. 5: The last sentence of this paragraph refers to levels of tritium found "naturally" in the environment. Tritium in the environment is generally man-made, with the exception of some found in seawater, but definitely not inland fresh water. These references to tritium are misrepresentative of past incidences. The ***Contamination of Municipal Water Supplies in the Denver Metropolitan Area by the Rocky Flats Plutonium Plant*** *report from the American Journal of Epidemiology cited that the amount of plutonium in Walnut Creek alone was found to be 286,000 times background, with the tritium release resulting in the contamination of Broomfield residents to such a degree that their urine was found to contain as much as 8,100 picocuries per liter of tritium. Tap water was found to contain as much as 18,780 picocuries per liter of tritium.*

Response to Comment 80

Please refer to Responses to Comments 40 and 58.

Comment 81

17) The report mentions, but does not adequately describe, the off-site contamination.

Response to Comment 81

Two recently completed DOE documents that further describe the offsite contamination areas are now available. They are the ***Past Remedy Report***, which describes the remedial action taken on offsite land, and the ***Historical Information Summary and Preliminary Health Risk Assessment Report***, which describes the sediment contamination in Standley Lake and Great Western Reservoir. An extensive remedial investigation of the offsite contamination areas is scheduled for completion early in 1994.

Comment 82

18) Page 9 and Appendix B: The CRP lists Pu-239,240, Am-241, Ur-233,234,235, and 238, and Tritium as the only radioactive "hazardous substances used at the plant that have released or that could be released to the environment." However, this list disagrees sharply with the much longer list of radioisotopes listed in the Health Physics Report. In addition to the CRP-listed isotopes, the "Health Physics Report" lists Pu-238, Pu-241, and Pu-242, natural Thorium, Curium-244, and Neptunium-237 as substances that have been handled at the RFP. Also, the Health Physics Report lists 14 additional

radioisotopes utilized at RFP as "registered and/or accountable sources subject to a twice yearly leak test and physical audit" and approximately that many other radioisotopes subject to yearly accountability.

Response to Comment 82

The list of hazardous substances included in the Community Relations Plan as Appendix B is not presented as a list of all hazardous substances historically and currently used at the plant, nor is it intended to be inclusive of all compounds potentially released from the plant. As noted in the plan, it is the list of hazardous substances used at the plant that have been released or that could be released to the environment as identified in the Interagency Agreement. The list was derived from preliminary information within DOE documents and is not limiting on remedial investigations.

Comment 83

19) An additional problem with this section, (p.9, par.6) is the statement that, in context, leads us to believe that the radiation emitted at the plant can be stopped with a sheet of paper (ie., alpha radiation). This is hypothetically true, but unfortunately the alpha radiation is usually in particle form and extremely hazardous if inhaled. If you are handling isotopes of plutonium other than 239 and 240, then again your characterization is wrong.

Response to Comment 83

Please refer to Response to Comment 59.

Comment 84

20) Page 13, par. 3: The Coors Brewery is in, not "near", Golden.

Reponse to Comment 84

The location reference has been corrected in the final plan.

Comment 85

21) Page 15, last par., p. 16, first par: You have no scientifically gathered data saying who favors and who opposes your operations. So don't try to sum up your loyalties and oppositions the way you have.

Response to Comment 85

The discussion is not an attempt to quantify total opposition or support to the plant and/or its mission. However, rallies of both opposition and support are part of this plant's history and have been significant methods of expression for the public. Please also refer to Response to Comment 41.

Comment 86

22) In the responsiveness summary to our comments, we would appreciate a response to our comments, numbers one through twenty-one.

Response to Comment 86

Responses are provided for each comment as requested.

COMMENTOR: Greg Marsh, Citizens Against Rocky Flats Contamination

Comment 87

We people at CARFC cannot believe the general lack of knowledge of the person(s) responsible for this sadly lacking document. But we also did not expect much either and have found that its content and sugar coating of the facts is congruent with all similar previous documents. It appears to be another document from someone that will be here today and gone or promoted tomorrow after their dirty work is done. Just like all the others. This is just another nail in DOE's credibility coffin.

It is clear once again that DOE has chosen to put flunkies and other totally unqualified, immoral people in charge of an important document. So many distortions, lies and deletions of what the RFP site is and what actually occurred exist in this much abbreviated document that its difficult to decide where to start and end without omitting some. When will DOE start using credible and qualified experts to create documents and policy?

In addition to discarding this entire document and starting anew, DOE should consider hiring a few of their many critics and enemies to write a good report and then butcher it as much as it dares.

Response to Comment 87

Please refer to Response to Comment 34.

Comment 88

Briefly, the CRP either grossly distorts the significance of or omits relevant and important information about the following:

1. *The site description and its proximity to the people who live nearby in the radiotoxic fallout zone.*

Response to Comment 88

Several changes and additions to the demographic information have been made in the final plan in response to public comments. The site description in the Community Relations Plan provides clear and accurate information on the location of Rocky Flats relative to nearby populations and includes several maps of the area. We do not define any areas as being within a radiotoxic fallout zone. Please also refer to Responses to Comments 7, 9, 10, 29, 46, 47, 48 and 50.

Comment 89

2. *The presence of schools, day care centers, and the recent establishment of nearby oncology treatment centers because they are now economically viable in that location.*

Response to Comment 89

The draft Community Relations Plan discusses the number of schools and major hospitals within 10 miles of the plant and identifies the school closest to the plant. A reference to the day care facility closest to the plant has been added to the final plan in response to your comment.

DOE did not attempt to record business trends in the area, such as oncology treatment centers or other specific services, because such an effort is outside the scope of this document.

Comment 90

3. *The plant's history of diabolical 'accidents', which, necessarily could have been prevented had competent people been in charge.*

Response to Comment 90

Please refer to Response to Comment 34.

Comment 91

4. *The "first significant event of public interest" was not the 1957 fire which was, at the time, the worst industrial fire in the history of this country. It is all the "accidents", collectively that we are about to learn of that were successfully hushed up by the many immoral regulations that effectively prevent the taxpayers from holding those responsible, accountable.*

Response to Comment 91

It is true that historically much of this information was limited. However, much more information describing historical accidents at the plant is now available to the public for review, and more is added to the information repositories monthly.

Comment 92

5. *One such immoral regulation is the Atomic Energy Act that has shrouded the amount of plutonium which is MUFed, Missing and Unaccounted For.*

Response to Comment 92

The information you reference is classified for purposes of national security. Please also refer to Response to Comment 25.

Comment 93

6. *No one with the slightest knowledge of the nature of how routine operations are conducted on a day-to-day basis would begin to believe that only 25/1000ths of a curie of Pu were released in the 1969 fire.*

Response to Comment 93

Actually, the amount you reference is the estimated release from the 1957 fire, not the 1969 fire. DOE estimates that the amount of plutonium released from the 1969 fire was 856 microcuries. Please also refer to Responses to Comments 35, 36, 57, 74 and 75.

Comment 94

7. *This report lacks a bibliography that should include additional readings by independent authors about the DOE and its predecessors and what they have done to our environment and people without their informed consent such as the "American Nuclear Guinea Pig Experiments". In this vein no mention is made of the use of local high school kids (who were not given protective equipment) to cleanup after the '57 and '69 fires so employees would not reach their body burden of radiotoxic compounds. No records were kept of these students nor were medical reports made on them.*

Response to Comment 94

The draft Community Relations Plan includes a bibliography of documents referenced in the plan and used in its preparation. The DOE Rocky Flats Public Reading Room can provide a more comprehensive list of documents written about the Rocky Flats Plant, and the listed documents are available there for review.

We know of no cases where high school students participated in any cleanup during the history of the plant. We would like to know the source of this information so that we can investigate the claim.

Comment 95

8. *The 903 pad area is a bad joke for the people of Colorado and all future generations since the "remediation" done there was totally inadequate given the knowledge of radiological hazards at the time it was "remediated".*

Response to Comment 95

The removal of waste drums and contaminated soil from the area and the subsequent capping of the area with an asphalt pad were viewed as short-term efforts to control the further spread of contamination. DOE never considered this action a remediation effort.

An interim remedial action to clean surface water in the 903 Pad area is currently in progress. The final remediation of the 903 Pad area will occur according to the schedules established in the Interagency Agreement and after extensive environmental investigations, technical analyses, regulatory approvals and public review and comment. Please also refer to Response to Comment 39.

Comment 96

9. *All of the members of the surrounding community want RFP cleaned up. This is not made clear in this document as well as the fact that no cleanup of this site can be achieved until the 47 vents, that daily pump radiotoxic respirable sized particles into the air, are shut off and all plutonium smelting and handling operations cease.*

Response to Comment 96

Please refer to Response to Comment 45.

Comment 97

10. *The second to the last paragraph on p. 9 is a case in point that demonstrates the incompetence of the authors. Clearly, the author cannot tell a particle of plutonium from an alpha particle.*

Response to Comment 97

In writing documents for general public information, DOE continually works to balance technical accuracy and detail with simplicity and clarity. The paragraph you cited demonstrates a decision of this nature. We hope to continually refine our communication to best serve the needs of the public. Please also refer to Responses to Comments 59 and 83.

Comment 98

11. *This document provides nothing new, rather it is a rehash of the same old philosophy, tell the public as little as possible, tell the public nothing new, use the wrong people to do so and do not change the status quo. It could be used for something worthwhile such as the introduction of a forum to listen to and benefit from the publics' concerns including technical input. For example, about 2 years ago the suggestion was made by a former RFP engineer to de-water the ground upstream of the plant before it is contaminated. What has the RFP done with this idea? Not one damn thing and the current operators were not even told of this suggestion by the former contractor when they were driven out of town like a frightened little dog with its tail between its legs. It has been accurately suggested that talking to the RFP is like communicating with a 'black hole'.*

Response to Comment 98

DOE's community relations objectives are to inform the public about the mission and activities of the plant and to involve the public in decision making when possible. Many Rocky Flats documents undergo public review and comment, and many have been changed to reflect public concern.

A recent example of the effect of public comment is the plant's change in approach to surface water interim remedial action at the 903 Pad, Mound and East Trenches Areas. The plant initially proposed one interim action that involved two drainage basins, the South Walnut Creek drainage basin and the Woman Creek drainage basin. Based on public concerns expressed during the public comment period on the proposed project, the plant decided to divide the interim action into separate interim actions for each drainage basin.

Comment 99

12. *The content of the second paragraph, p.17, is entirely understated and does not give the raid the perspective required in a credible CRP. The results of that raid are so extensive that it is taking a lot longer that usual to compile all of the indictments. Where is discussion about the biggest lawsuit in history? The one started by Mr. Stone that is addressing wholesale violations of the 'False Claims Act', 31 USC Sec. 3729.*

Response to Comment 99

At the time of this writing, DOE has received no information about the results of the raid, including information about possible indictments. Although it is true that the federal Grand Jury investigating the case has collected an enormous amount of information over the course of the investigation, it is impossible to predict an outcome at this point. Please also refer to Response to Comment 62.

A discussion about the lawsuit brought by Mr. Stone is not included because it is not an event of wide public interest as was the raid.

Comment 100

13. *Paragraph four. The RFP has never responded to public concerns except in cases that it wished. HOW MUCH PLUTONIUM IS MISSING AND UNACCOUNTED FOR??? The purpose of the plant's PR people is to stonewall the public and deflect criticism from those in charge at taxpayers' expense. Hiding behind the Atomic Energy Act will prevent you from attaining your goals unless what you are hiding is too heinous for the public to tolerate such as the activities at the Nevada Test Site in the 1950s.*

Response to Comment 100

Please refer to Response to Comment 98.

Comment 101

14. *No tour of the plant has ever been conducted for the media or public without the plant regulating each and every step of the visitor. No real 'openness' has ever resulted from tours.*

Response to Comment 101

Plant tours are guided by certain rules and policies to maintain the security of the plant and the safety of the visitors. Nevertheless, members of the news media and hundreds of citizens have visited the plant over the last 18 months and have responded favorably to the tour program verbally and in writing.

Comment 102

15. *The visitors 'education' center is a scam created to present a completely one sided view of the operations and was created and implemented entirely by those on the RFP/DOE payroll.*

Response to Comment 102

The visitor education center, which is paid for by DOE, is a room on plantsite in Building 130 with several displays and exhibits about the plant and its various functions. Informational materials include an operational hand-held radiation counter with various household items that emit low levels of radiation for demonstration purposes. Also included for public examination are a sample glovebox and an actual size supplied air suit. The center, with its interactive displays, is a useful tool for understanding some of the plant's activities.

Comment 103

In closing this CRP changes nothing and does nothing. Given the fact that the only two way communication is between the plant and government bodies, which have no credibility, are staffed with Johnny-come-latelies & flunkies, the public still has no way to affect even simple change, let alone policy.

Response to Comment 103

The Community Relations Plan provides multiple opportunities for the public to affect change within the environmental restoration process. One recent example is the public's effective use of comment opportunities for the proposed interim remedial action at Operable Unit No. 2, the 903 Pad, Mound and East Trenches Areas. The plant initially proposed one interim action that involved two drainage basins. Based on public comment, the plant decided to divide the interim action into separate interim actions for each drainage basin. Please also refer to Responses to Comments 98 and 100.

COMMENTOR: Barbara Moore, Front Range Alternative Action Group

Enclosed please find written public testimony regarding the Department of Energy Rocky Flats Plant Community Relations Plan - Environmental Restoration. This is in addition to our public testimony at the CRP scoping hearing held in Westminster on March 13, 1991.

Comment 104

There is a need to publish a complete list of acronyms with each draft and decision document including the CRP. Exhibit 1 for this testimony should serve as an example of what this acronym list should include. Will the DOE include an acronym list with each and every draft and decision document?

Response to Comment 104

The draft Community Relations Plan already includes a list of acronyms that are used in the plan as Appendix G . Many DOE documents include a glossary of terms and/or acronyms specific to the particular document, and we will continue to include such glossaries or lists as much as possible to help the public understand technical issues.

Comment 105

It is imperative that the Department of Energy revise the Site Description. As it is, the Site Description would lead the uninformed to believe that this plant is in a remote location which is not the case at all. Below is a proposed replacement for the Site Description. The proposed replacement paragraphs are in italic. [Note: Because this document shows all public comment in italics, the proposed replacement paragraphs are printed in ***bold*** *type.] Since this is our Community Relation Plan this site description must accurately describe the affected communities, plant history, and its accidents.*

Why does DOE continue to print "facts" so grossly inaccurate, even after hundreds of citizens have loudly voiced their objection to these lies being introduced into various draft and decision documents? As long as DOE continues to try to cover up the basic truths they will never gain any respect or credibility within the community. To continue to fool yourselves that the people will believe what the (DOE) tells them is unrealistic and irresponsible. This practice further drives the already cavernous divisions between them and the public. What is the purpose of alienating the public with these practices?

Response to Comment 105

Please refer to Responses to Comments 29, 34 and 90.

Comment 106

Site Description

Replacements for page 4 paragraphs 3 and 4.

The Rocky Flats Plant is located in northern Jefferson County, Colorado, approximately 16 miles northwest of downtown Denver and 1.5 million people. The Rocky Flats Plant is located within 1 to 10 miles from the communities of Boulder, Broomfield, Westminster, Arvada, Golden and Leyden. The 384-acre plantsite is located within a 6550-acre buffer zone. There are over 40 Superfund sites in the Buffer Zone and over 130 Superfund sites within the plant site.

For more detailed maps DOE and EG&G could reference the "Denver Directory Yellow Pages A-Z" published by The Denver Directory Co., these maps were produced by Pierson Graphics Corp.

The Rocky Flats plant, located on the eastern edge of a geologic bench known locally as Rocky Flats, is at an elevation of about 6000 feet. The rocky bench is about five miles wide in an east-west direction. The plant is located on 5 major geological faults, and is within a 100-year flood zone. The Continental Divide is approximately 26 miles west of the plant.

Response to Comment 106

DOE appreciates the time and effort required to prepare this and the other replacement paragraphs. In response to your comment, a reference to the plant's distance from Leyden, which is approximately three miles, has been added to the final Community Relations Plan.

However, some of the suggested language is inaccurate. For example, there are not over 170 Superfund sites associated with Rocky Flats. The plant is one Superfund site as designated by EPA, with 178 individual hazardous substance sites identified for further investigation.

Comment 107

In a letter to Admiral Watkins, John T. Conway, Chairman of the Defense Nuclear Facilities Safety Board on May 18, 1990 (exhibit 2) questions what effects a seismic event would have at Rocky Flats. To quote Chairman Conway in his letter, "We recommend that this Rocky Flats SEP address all outstanding current safety issues and include, but not be limited to, consideration of the following items: Effects of severe external events, with particular emphasis on seismic events and high winds." Has the DOE or any of its contractors fulfilled this request? If not why not? When do you expect this study to be complete?

An article in the Denver Post dated 11/3/81 reiterated concerns expressed in a number of investigations and studies conducted in regard to plant safety.

- *The filter plenum in the plant's Nuclear Safety Facility couldn't survive a tornado, even if the plenum were properly anchored. With that anchoring, the plenum could survive 50-mile-an-hour non-tornadic winds.*
- *Ductwork and many of the piping systems at Rocky Flats lack lateral supports and would be subject to "large displacements" if an earthquake were to affect the plant area.*
- *Only with additional anchorage could the filter plenum fire detection panel resist an earthquake.*
- *And an earthquake might "significantly overstress" the heating, ventilating and air conditions control panel in the Fabrication/Assembly Building. Without additional bracing of the panel to adjacent walls, that overstressing might lead to failure of many of the internal frames of the panel.*

Have these concerns, as described above, been addressed and corrected? If not why not? If so, when and how?

Response to Comment 107

Questions concerning the potential effects of tornadoes and earthquakes on the integrity of plant structures and operations are not within the purview of the Community Relations Plan. Rather, the plan addresses public information and involvement in environmental restoration activities. For information on these issues, we ask that you submit your questions in writing to the DOE Rocky Flats Public Affairs Office.

Comment 108

The Rocky Flats Plant is directly upstream of two reservoirs, Standley Lake and Great Western Reservoir, that are used for municipal water supply. Effluents from the plant feed directly into the only streams and creeks that supply water to these reservoirs.

Response to Comment 108

Although the plant is directly upstream of the reservoirs, it is important to mention the plant's network of holding ponds for water sampling and treatment prior to release from the site and the systems in place and planned to divert this water around the reservoirs. The final plan has been revised to include a reference to current efforts to completely separate the plant from the communities' drinking water supplies.

In response to the second sentence of your comment, Great Western Reservoir and Standley Lake actually receive most of their water from Clear Creek and Coal Creek through a series of diversion ditches.

Comment 109

Plant History

Replacements for page 4, paragraph 5 and pages 7 and 8.

The Rocky Flats Plant is a key facility in the federal government's nationwide nuclear weapons research, development and production complex. It supports the nuclear weapons program and other work related to national defense with processing capabilities for the fabrication of weapons components from plutonium, uranium, beryllium and stainless steel.

Construction of the Rocky Flats Plant began in 1951, and initial operations began in 1952. The plant was operated at that time by Dow Chemical Company, for the U.S. Atomic Energy Commission. When the Energy Reorganization Act of 1974 dissolved the U.S. Atomic Energy Commission, federal government responsibility for the plant was assigned to the Energy Research and Development Administration.

On July 1, 1975, Rockwell International assumed operation of the plant for ERDA. Denver survived 24 years of Dow Chemical Company's management of the Rocky Flats Plant which was remarkable when considering that Dow so mismanaged the government-owned facility it was referred to as a textbook case on how not to do things. To make matters worse, Dow's management frequently attempted to conceal its mistakes over the years by lying to the public.

Throughout the plant's history, plant operations have incorporated some safety controls to protect workers, the public and the environment. Nevertheless, these safety controls were often ignored or never taught to the operators on the floor. This resulted in numerous releases, accidents, spills, fires and exposures. The plant historically used disposal methods that would include shallow-land burial, open burning of plutonium contaminated machining oil, and direct release of hazardous radioactive liquid waste into streams and creeks that ran offsite into drinking water supplies. These areas are currently being remediated or are scheduled for remediation.

The first significant event of public interest was an explosion and fire that occurred on September 11, 1957, in plutonium processing building 771. Most damage was in the building's ventilating system, the fire inside these vents took over 8 hours to extinguish. There is significant debate over what the total release of plutonium was from this fire. Since there were not any operable monitors in place after the fire we can only report that plutonium was reported to have traveled as far south as Colorado Springs and as far west as the Continental Divide.

A second significant fire took place on May 11, 1969, in building 776 and 777, also used for plutonium processing. At the time this was the worst industrial

accident ever recorded thoughout the world. This fire was nearly identical to cause and effect as the '57 fire. After the fire examinations of the plant and animal life showed considerable uptake of plutonium into these ecosystems.

At the time of these fires the operating contractor Dow Chemical failed to notify Local and State health, safety and disaster personnel which robbed the public from being able to make their own decisions as how to best protect their children and families from radiation exposure. This violation of basic rights has been a major source of mistrust and conflict with the public and the operators of the plant.

Environmental investigations of the sediment in the two municipal domestic water reservoirs, Standley Lake and Great Western Reservoir, revealed significant deposits of plutonium, tritium, and americium in the sediments of these reservoirs. These reservoirs are only two of the 178 Superfund sites scheduled for remediation under the IAG. It is believed that the plutonium settled into these reservoirs from fugitive dust and through direct release of liquid effluents from the plant into the creeks that flowed into these reservoirs.

An area in the southeast corner of the plantsite, now know as the 903 Pad Area, was and continues to be a major source of fugitive plutonium dust since 1959. The 903 pad the and 903 lip areas are currently undergoing an Interm Measure/Interim Remedial Action.

See exhibit (3) "Living Within a Radioactive Fallout Zone" and exhibit (4) "Cancer Incidence in an Area Contaminated with Radionuclides Near a Nuclear Installation" by Carl J. Johnson for more information on fugitive dust and its consequences.

Response to Comment 109

The function of the Community Relations Plan is to provide someone unfamiliar with Rocky Flats with a general understanding of why the plant was placed on the Superfund National Priorities List for cleanup and to outline opportunities for public information and involvement. DOE feels that the plan should be written in an objective and nonjudgemental manner, describing the plant's history without issuing credit or blame to plant operators for various events, decisions or actions.

Comment 110

The 903 pad has been a great source of concern and debate for over 24 years. For this reason a brief history of the 903 area has been provided.

July 1958	***Drum storage area established. During the next 9 years drums were continually added to the area. These drums contained machine cutting***

	oils, solvents, lathe coolant and carbon tetrachloride contaminated with plutonium and uranium.
July 1959	*First drum leakage discovered. A rust inhibitor, ethanolamine, was added to drums to minimize corrosion.*
January 1964	*First evidence of large scale deterioration of drums reported.*
January 1967	*The last drums were added to storage area and removal began. Oldest drums shipped first.*
June 1968	*Last drum shipped to Building 774 for processing. High winds spread resuspended contaminated soil into nearby environments.*
July 1968	*Radiation monitoring and mapping of area completed.*
September 1968	*Preliminary proposal for containment cover prepared by DOE Chemical Facilities Engineering.*
July 1969	*The remedial action was to cover a 152,000 square foot area with compacted fill dirt. Topped with 3' layer of asphalt. First coat of fill material applied.*
August 1969	*Fill work completed, paving contract let.*
September 1969	*Overlay material, soil sterilant and asphalt prime coat completed.*
November 1969	*Asphalt containment cover completed including four sample wells.*
November 1969	*Independent scientists reported that his analysis indicated there are about 5 curies of plutonium in the area of the plant boundary. Today this area is part of the buffer zone.*
May 1970	*The last of the waste removed from the pad had either been reprocessed or had been repacked and transported to the AEC burial ground in Idaho. Motivated by the 903 incident the Colorado*

	Department of Health placed their first monitors at and around the plant.
April 1971	*Dow scientists researching the pad and lip area led them to remediate the lip area with commercial stabilizers. Three 625-square foot areas adjacent to the pad have been sprayed with a different stabilizer. The scientists also set aside three 90-square foot areas that was to be used to study growth of vegetation.*
May 1971	*A plant director said "Time is on our side...Contamination in the pad (asphalt-covered) area is being retained and studies show it will not spread. The only limiting factor would be deterioration of the asphalt." The public was then told that monitoring of the contaminated areas has confirmed that the radioactive material is trapped in the ground between the fill dirt and the asphalt pad on the top and a thick layer of clay that appears to be a natural barrier. The public was told that the absence of ground water on the barren site prevented the plutonium from leaching horizontally.*
July 1971	*Some significant notes taken from the report by the Nevada Applied Ecology Group Steering Committee: "Any extensive cleanup of plutonium contaminated area should not be initiated until extensive health implications and radioecological significance has been evaluated.*
March 1972	*A Los Alamos researcher reported that there was no serious problem with the plutonium in these soils. Options for treating the area included removal of soil. Covering it with a mat of oil, asphalt, cement to "fix" the plutonium. Do nothing. To leave the plutonium in place. The factors are such that it's felt that it poses no real hazard to the people. Some decent sampling might be done.*
1974	*US AEC Rocky Flats Plant 1974 Environmental Surveillance Summary Report. This report states with one exception, all levels reviewed in this report, regardless of the environmental*

	media samples, are below any existing applicable standard for the general population exposure through 1974. The one exception is plutonium in the soil southeast of, and adjacent to the plant boundary, which exceeds state standards. This area is now a part of the buffer zone.
80s	*Concrete blocks containing plutonium waste were stored on top of the pad. Some of the blocks eventually melted further contaminating the area. The blocks contained waste from the solar ponds.*
April 1986	*The 903 pad was identified as a potential CERCLA site. The site was given a 26 on the EPA Hazard Ranking System as identified in CEARP Phase I.*
March 1987	*Phase I Remedial Investigation (RI) under the Environmental Restoration Program began at OU2. The investigation consisted of the preparation of topographic maps, radiometric and organic vapor screening surveys, a soil gas survey, soil sampling and ground and surface water sampling.*
December 1987	*Draft RI was submitted to EPA and CDH. Phase I data did not provide adequate information on the nature and extent of contamination.*
June 1988	*Draft RI Phase II Sampling Plan was submitted to the regulatory agencies.*
December 1989	*A draft IRAP plan for contaminated groundwater was submitted. Regulatory agency review of the document determined that insufficient information on the nature and extent of groundwater exists at this time to pursue effective groundwater remediation.*
April 1990	*RCRA Facility Investigation/Remedial Investigation Study (RFI/RIFS) sampling plan was approved by the EPA. This plan provides a phased approach to investigate the extent of contamination.*
September 1990	*The Proposed Surface Water Interim Measures/Interim Remedial Action Plan and*

Decision Document - 903 Pad, Mound and East Trenches Areas. Operable Unit No. 2 was released to the regulatory agencies and the public for review. Copies of this document were not widely available.

September 1990 ***Public Hearing on the above mentioned IM/IRA.***

The above description was included so the reader has an example of the high level of involvement the public has had on just one site being remediated. Hence, the need for a comprehensive, exacting, community relations plan.

Response to Comment 110

In addition to some inaccuracies, the proposed replacement information is far too detailed for the purposes of the Community Relations Plan. Because the concept is a good one, however, DOE will develop a general timeline for the Rocky Flats Plant as a fact sheet.

Complete information on contamination of the 903 Pad, Mound and East Trenches Areas is available in technical assessments and plans for environmental cleanup of Operable Unit No. 2. These documents can be reviewed by the public at the information repositories listed in Appendix D of the final Community Relations Plan.

Comment 111

In May 1973, a tritium release was discovered by the Colorado Department of Health in a water sample taken from Walnut Creek, which flows into Great Western Reservoir. The release occurred in waste water as a result of the unanticipated presence of tritium despite a similar release in the late 60s. Tritium is still detectable in significant amounts 17 years later.

Response to Comment 111

Please refer to Responses to Comments 40, 58 and 80.

Comment 112

Replacement for page 9, paragraph 6.

Plutonium, the primary radionuclide of concern at the plant, has been detected in elevated concentrations east of the plant and onsite as described above. Plutonium particles can barely penetrate the skin's surface and can be completely stopped by a sheet of paper. However, the toxic and radioactive emissions are extremely hazardous if exposed to via irradiation, inhalation or ingestion.

The Draft Environmental Impact Statement - Rocky Flats Plant Site Golden, Colorado, Volume 2. September 1977, Energy Research & Development Administration, page G-17 states "The genetic risks considered in the BEIR report include the full spectrum of genetic defects seen in the U.S. and other western nations. Their effects upon the carrier may range from a lethal action occurring at any time of life (from before birth until death), to minor metabolic consequences that may be nearly undetectable. The genetic spectrum ranges from dominant single gene mutants whose effects may be categorically recognized, to subtle genetic contributions to disease conditions that are predominantly of environmental or non-genetic origin."

Response to Comment 112

Statements reflecting the potential health effects of plutonium and other hazardous substances handled at Rocky Flats are already included in the draft Community Relations Plan.

Comment 113

We find it alarming that on page 9, paragraph 6 it states that "current plutonium operations are carefully controlled." Exactly what are the current plutonium operations? How many operators are directly working with plutonium on a daily basis? For what purpose is this work being performed and what is the quantity of the plutonium being used? What types of plutonium are being used in current operations? What amount of waste is produced due to these operations? It is the general understanding that plutonium operations had ceased so this statement definitely requires a more detailed explanation.

Response to Comment 113

The word "current" has been eliminated from the referenced statement. Plutonium operations were suspended in December 1989 for safety upgrades and procedural improvements. Routine maintenance and upgrades in the plutonium handling areas are ongoing.

Comment 114

On page 11, paragraph 4 states "The IAG provides milestones for the activities and documentation requirements for CERCLA and RCRA remediation of the 16 operable units. The milestone schedules currently extend into August 2001." It is imperative that the Department of Energy establishes a system to notify the public of any and all changes to these milestones. The system set up to provide this notification must be one that the communities, citizens and organizations have reviewed and endorse as the best possible method of notification. It is our legal right to be kept informed on these changes, and with so many dates and activities, without an approved system it will be extremely easy for the DOE to bury the public with misinformation on lost deadlines for these activities to take place.

Will the DOE establish a system of notification of any and all deadline changes as described in the above paragraph?

Response to Comment 114

The draft Community Relations Plan states that if modifications to the IAG result in changes to the IAG schedule, the plant will notify the public through the plant's ***Environmental Restoration Update*** and through issuance of a news release. The ***Environmental Restoration Update***, which is published approximately every two months, describes progress in our environmental restoration efforts. The update is mailed to more than 1800 individuals and organizations on the plant's mailing list.

In addition, it is our general practice to notify the public of requests and approvals for milestone deadline extensions by publishing that information in the ***Environmental Restoration Update*** and in the ***Monthly Progress Report on Environmental Restoration***. The ***Monthly Progress Report on Environmental Restoration*** is available to the public at the information repositories listed in Appendix D of the Community Relations Plan.

IAG milestone extensions are also listed in the monthly information summaries provided by DOE, EPA and CDH to the Rocky Flats Environmental Monitoring Council. Copies of the summaries are offered to the public at the Council's monthly meetings.

Comment 115

Page 13 describes the Community Background. Paragraph 3 has an outright lie in it unless for some unforeseeable reason the DOE has never noticed the gravel operation that sits directly west of the plant. This gravel operation is physically right next to Rocky Flats' back door. What could that distance possibly be? It is apparent that the Department of Energy and EG&G have never taken a driving tour of the neighborhoods, communities, farms and ranches surrounding their plant. What is most perplexing is how the authors of these documents get into and out of the plant without passing these areas? The only possible explanation is that the researchers executing the production of these documents are so narrowly focused that their blinders do not allow them to witness even the most obvious details if it is not in the Department's best interest to notice them. This is exactly the type of issue that further destroys any credibility the DOE may have with the public. When does the DOE plan on providing realistic truthful information?

If you cannot honestly relate basic facts about the plant how can you possibly expect the public to believe you on the more important issues?

Will DOE be sending its researchers into the community for a driving tour? Will they allocate additional funding to these researchers so they can finally get the basic information halfway correct? Will DOE continue to let this type of practice demonstrate their ineptness?

Response to Comment 115

The gravel operation you reference is identified in the draft Community Relations Plan and is described as being located northwest of the plant along Highway 93.

Comment 116

Replacement for page 13, paragraph 5.

Ninety-three public schools are located within 10 miles of the Rocky Flats Plant, half of which are downwind. There are preschools and day care centers within a 5-10 mile radius. The school closest to the plant, Happy Valley Pre-school, is less that 3 miles from the plant (see exhibit 6). Four major hospitals located in Louisville, Westminster and Boulder are approximately 5 miles from the plant.

Response to Comment 116

Happy Valley Childrens Ranch, located near Indiana and West 64th Avenue, is actually about 5.5 miles from the plant, and this information has been added to the final plan. As stated elsewhere in this responsiveness summary, all radial distances are calculated from the center of the plant's developed area. Please also refer to Response to Comment 89.

Comment 117

In regard to Public Information and Involvement Needs perhaps the most unforgivable issue in regard to the IAG and the CRP is that there is no mechanism for enforcement available to the public through the IAG or the CRP. It is great to tell the public that the DOE is going to do certain things and conduct defined described activities to bolster public acceptance and confidence, but without providing the public method of enforcing and improving these activities the words are totally meaningless. It is the same as putting up speed limit signs on our roads and highways but not having any police on the road to ticket violators. What percentage of the drivers do you think would still obey the speed limits without enforcement?

It has been suggested time and time again in hearing after hearing over the past 2 years that the public wants and demands to have some method of enforcement made available other than a civil lawsuit. Why is this issue continually ignored? What would it hurt to provide this to the public? It is our tax dollar that has unwillingly supported this catastrophe. It is now our right to demand that the DOE immediately provide an enforcement mechanism for use by the public. It has been suggested before that this would be in the form of a Citizen Dispute Resolution Process similar to the Dispute Resolution Process provided to the State of Colorado and the Environmental Protection Agency in the IAG. The Citizen Dispute Resolution would provide a method to stop any activity related to cleanup or any activity on plantsite that would recontaminate, interrupt or in any way impact future remediation activities. It is extremely urgent that a Citizens Dispute Resolution be enacted. That the selection of the committee

members be selected and chosen entirely by the public via opinion poll or some sort of interview process for recommendations. If the DOE decides not to provide for this request please submit detailed descriptions explaining exactly why this request is refused once again. Provide not only references to back up your statements, but include copies of these references in the responsiveness summary.

Response to Comment 117

There exists no mechanism in law for a binding citizen dispute resolution process. The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) provides the basis for the responsibilities and dispute resolution process set forth in the IAG. One particular CERCLA citation that applies is 42 USC 9620 Section 120, Federal Facilities, paragraph (g), Transfer of Authorities, which states, "Except for authorities which are delegated by the Administrator to an officer or employee of the Environmental Protection Agency, no authority vested in the Administrator under this section may be transferred, by executive order of the President or otherwise, to any other officer or employee of the United States or to any other person."

Because there is no formal mechanism for citizen dispute resolution, DOE is willing to explore an informal process for examining technical differences if a framework that is mutually satisfactory can be developed. DOE expressed interest in working with the public on this issue at the public comment meeting on the draft Community Relations Plan. At that time, the Rocky Flats Cleanup Commission was asked to offer some specific ideas for informal dispute resolution. Please also refer to Response to Comment 67.

Comment 118

The DOE and EG&G continue to play games with the citizens that research these issues extensively. DOE and EG&G knows who we are. Perhaps 50 citizens review, critique and comment on documents and prepare testimony for public hearings. Yet DOE and EG&G refuse to provide these individuals with their own documents via direct mail. Some of the citizen reviewers through extreme stubbornness, persistence and assertiveness will eventually obtain a copy of these documents to review. There is no reason in the world why the DOE and EG&G cannot provide all the directors of the Rocky Flats Cleanup Commission with their own copies. At present DOE seems to think that 16 directors can each critically review these documents with only 10 copies. That may be possible given months were available for this review, but often is the case we are only given a few short weeks to provide this review. Working with these figures means the directors of the Rocky Flats Cleanup Commission will have on the average of 1-2 weeks to review a document, if they are lucky, that is hundreds of pages long and is extremely technical and complex in nature. This is only one example of how the DOE continues to take unfair advantage of the public. Another example of the DOE taking unfair advantage of the interested public is to look at the schedule for April 1991. Why was it necessary to cram 4 major public hearings into a 3 week period? Provide a detailed explanation as to why it is absolutely impossible to provide these documents to the few interested citizens who really do review these documents. Keep in mind that it is our tax money that will pay for this and this is just one of the ways we want our money spent.

Response to Comment 118

DOE understands the public need for information about the plant and continues to seek effective and efficient methods of disseminating information. Mailing documents to the public is one of several mechanisms we use to satisfy this need.

The schedules set forth in the Interagency Agreement, which were negotiated by the three parties to the agreement, are extremely tight, and often our environmental restoration documents undergo modifications right up to the deadline. The documents are usually at least two volumes and contain many maps and drawings that are time-consuming and expensive to reproduce. When copies are available for distribution to the public, our first priority is to deliver them to the five information repositories so that everyone, including the Cleanup Commission, has access to them.

In addition, DOE sends copies of all public comment documents required by the Interagency Agreement to 10 directors of the Cleanup Commission. DOE and the Cleanup Commission agreed to this number at a meeting with EPA on October 5, 1990.

We also distribute documents to individuals and organizations upon request if more copies of the documents are available. If not, we direct them to the DOE Rocky Flats Public Reading Room where they can review the document and/or make a duplicate using the copy machine there.

In the case of the draft Community Relations Plan, which is small and inexpensive to reproduce relative to most of our documents, DOE distributed more than 150 copies to members of the public. At the other extreme, however, some documents can cost over one hundred dollars each, particularly if color maps and drawings are included. We are keenly aware that tax dollars pay for these documents and feel an obligation to spend them wisely.

Regarding your comment about public hearings, please refer to Response to Comment 54.

Comment 119

We strongly urge that the DOE and EG&G discontinue using the Rocky Flats Environmental Monitoring Council as a repository and find a replacement repository for these public documents. The RFEMC library, if it can be called a library - it's more like a store room of documents - is staffed by only one person. Access to this repository is by appointment only. If one drops by and knocks on the door loud and long enough one may be able to gain access. This is absolutely unacceptable. The public demands to have a real library, one that will catalog and shelve these documents in some sort of order and will maintain hours of operation convenient to the public.

Response to Comment 119

DOE will continue to send documents to the Rocky Flats Environmental Monitoring Council for placement in its repository as required by the Interagency Agreement. Over the last few

months, DOE has worked with the Council to improve the repository's cataloging system so that the repository is much easier for the public to use.

For interested citizens for whom the Environmental Monitoring Council's respository is not convenient, Rocky Flats documents are also available for public review at CDH, EPA, the DOE Freedom of Information Office in Washington, D.C., and the DOE Rocky Flats Public Reading Room at Front Range Community College. Evening access is offered at the DOE Rocky Flats Public Reading Room.

Comment 120

The Rocky Flats reading room at the Front Range Community College is still incomplete. The DOE and EG&G continue to drag their feet in providing a complete and entire copy of the Administrative Record at this official repository. This reading room is our resource area and it is intolerable that there are so many missing documents. When will the Rocky Flats reading room be up to date? If this reading room cannot be brought current by June 1991 provide a detailed explanation as to why this cannot be done.

In addition documents published by the Rocky Flats Cleanup Commission, Greenpeace, the Rocky Flats Alliance and other like organizations must be included in all the reading rooms as a source for independent review. They would need to be cataloged and cross-referenced by topic and author.

Response to Comment 120

For information on the Administrative Record, please refer to Response to Comment 44.

DOE is continually adding documents to the Rocky Flats Public Reading Room in an effort to serve the community with information about the plant. If users of the Reading Room request the addition of specific documents, we will try to acquire those documents for the Reading Room. If multiple copies of these documents are available, we will also provide them to the other information repositories. Also, DOE will add to the Reading Room collection any Rocky Flats documents given to us by other agencies or organizations upon their request.

The Reading Room maintains a list of present holdings, which is updated approximately monthly. DOE provides the updates to each of the information repositories listed in Appendix D of the Community Relations Plan.

Comment 121

All public notices placed in the local papers need to be placed in the legal notice section of the classifieds. As it is now, these notices often are mistaken for advertisements and missed. If it were known that any and all notices were to be placed in specific locations, then we the public can easily check for these notices on a daily basis. As it is, even informed citizens often miss

the public notice because of its display and location. How will you correct this problem? How long will it take for these corrections to take effect?

Response to Comment 121

DOE is required by the Interagency Agreement to publish a display advertisement in a newspaper of general circulation to announce a public meeting. We always ask the newspapers in which we announce our public meetings to place our advertisements in their news sections, which we believe are read more by the public than are the legal notice sections. Readership statistics provided to us by the Denver Post show that the main news section is read by about 20 percent more people than the classified section.

In addition to advertising in the newspapers, we issue press releases about public meetings to all local news media and mail copies of the advertisements to more than 1800 individuals and organizations on the Rocky Flats mailing list.

Comment 122

Participants in the Technical Review Group must be chosen by the public. Either by a poll through the mailing list. Or by asking the public to nominate participants on this board. Participants on the Technical Review Group must not be employees, spouses of employees, or contractors to the RF Plant. Provide a detailed explanation as to how these participants will be chosen. If the public is not going to have a voice as to who will be chosen to sit on this group give the public a detailed explanation as to why they are not qualified to choose who they want to represent them on this group.

Response to Comment 122

Participants in the Technical Review Group include area municipalities and several interest groups involved in environmental restoration issues. DOE, EPA and CDH identified the groups that would be invited to participate, with strong emphasis on local municipalities since their elected officials are representative of the general population. Each identified group then designated a representative. Through its varied interests and perspectives, the membership represents a broad spectrum of the community. Other members may be added in the future as the role and function of the Technical Review Group matures. Please also refer to Responses to Comments 14, 22, 28, 52, 55 and 66.

Comment 123

If the above proposed replacement paragraphs and pages are not used as direct replacements and/or additions to the Community Relations Plan, describe in detail why each replacement was not used, what investigations took place, what the results of the investigations were, and include references and copies of the actual references. Respond to this paragraph even though it is not in a question form as it was too difficult to describe what is wanted in a question format.

Response to Comment 123

The proposed replacement paragraphs are separated and responded to as comments. References for the information in the Community Relations Plan are included in the plan as Appendix G, and the references are available at the DOE Rocky Flats Public Reading Room.

Comment 124

In general it is appalling that the Community Relations Plan was a meager 33 pages long. When you consider the extended history and involvement the public has had over the past 25 years it is shocking that this is the best DOE and EG&G can or better put will do. This Community Relations Plan was boasted to be one of the best community relations plans in the DOE complex and within the EG&G Corporation. If this is the best either of them can do, it makes one wonder what the worst community relations plan looks like. The mind boggles just thinking about it.

When looking at what was not included as well as what was included, it is evident that this CRP was not a priority, nor was it provided with the adequate resources necessary to do the job. Little concern was given to its content and integrity. The context was so general it did not benefit or enhance the knowledge of the novice Rocky Flats researcher, the advanced Rocky Flats technical reviewer, or anyone in between. The misinformation is insulting, negligent and, in the minds of many citizens, criminal, especially in light of overwhelming evidence presented contrary to many issues present in this CRP. Was this intentional? Did the DOE want to test the waters, so to speak, and see what will be tolerated?

Misinformation is a way of life when talking about Rocky Flats and many reviewers overlook the more minor issues. However, when it sinks in that this document is supposed to benefit and greatly improve community relations and involvement, it is a real slap in the face. IF THE FINAL CRP IS ANYTHING LIKE THIS DRAFT, THE DOE SHOULD FULLY EXPECT TO HAVE IRREVERSIBLE DAMAGE DONE TO ITS ALREADY FRAGILE, BRITTLE AND STRAINED PUBLIC RELATIONS. Considering it took one year to produce this draft document, it would be advisable and in everyone's best interest to flood your resources into developing a Community Relations Plan we can live with. Why? Because we insist on it. We are going to have to live with this plan for a long time (like 24,000 years).

For additional information on public distrust see Exhibit 5, which is a letter from Concerned Health Technicians For a Cleaner Colorado, dated October 13, 1989, to the Ahearne Commission.

Let the past experiences with the community be your guide. Think about the past lawsuits, the pending lawsuits and the lawsuits on the back burner. Then look at the increasing tension and distrust in the community. Then look at the ever growing number of active citizens speaking out and attending countless meetings and hearings. It is obvious that we are not going away and we will continue to make working and managing Rocky Flats like living in a fish bowl. The public pressure of the past year and a half clearly demonstrated how effective this pressure is - it has kept EG&G from resuming plutonium operations at the plant. It is this ever growing resolve and strength that will keep the Rocky Flats Plant from operating until all wastes and residues are in compliance with all local, state and federal regulations.

With or without a workable CRP we will continue to maintain an extremely high level of involvement with all plant operations. It would just seem to be in everyone's best interest if the DOE and EG&G really did demonstrate a true desire to cooperate with the public. Perhaps life in the fish bowl won't be so tough to swim against the tidal wave of public opposition.

Response to Comment 124

You are correct that much of the information provided in the draft Community Relations Plan is general. The plan is not intended to provide a comprehensive history or status of technical activities at the plant. That level of information can be found in countless other documents written for those purposes. Instead, the Community Relations Plan is intended to provide the basic historical, geographical and technical details necessary for a reader unfamiliar with Rocky Flats to understand why the site is listed on the Superfund National Priorities List.

The draft plan was prepared according to the EPA guidance on Superfund community relations plans and received the preliminary approval of EPA and CDH before dissemination for public review. DOE feels that the plan responds to the information and involvement needs of the communities surrounding Rocky Flats and offers a solid foundation for future cooperation among all parties involved in cleanup issues.

DOE welcomes the involvement of the interested public in plant activities. We see much value in working with oversight groups, interest groups, businesses, educational organizations and others as we implement ever-improving methods of operation and management and seek better communication with the public.

Comment 125

P.S. It has recently been brought to our attention that Admiral Watkins is going to disband the AHEARNE Commission [Advisory Committee on Nuclear Facility Safety]. This is absolutely unacceptable and will not be tolerated by the community. We feel that AHEARNE is one of the few branches of the DOE that actually listens to our concerns. If Admiral Watkins decides to go through with this plan we demand a full and complete report as to why this was done and what mechanism will DOE provide the communities as an alternative to the AHEARNE Commission.

Response to Comment 125

DOE understands the public's desire for independent oversight of Rocky Flats, and we will pass your concerns on to Secretary Watkins.

COMMENTOR: LeRoy Moore, Rocky Mountain Peace Center

Thank you for sending a copy of the ***Rocky Flats Plant Community Relations Plan - Environmental Restoration Program****. I am unable to attend the 13 March public comment meeting, but do have a few comments.*

First, I applaud your efforts to make people from the affected public part of the process of planning for environmental restoration, though I recognize that this is required by law. The following comments focus on particulars and are not meant to be comprehensive.

Comment 126

The section on "Plant History" is seriously flawed. It repeats on page 7 the official myth about the 1957 and 1969 accidents. This is totally unacceptable, given the existence of fundamentally differing interpretations of the plant's history. Either report with full documentation the alternate interpretations of these two accidents, or refer to the accidents without making misleading claims about the amount of radiation released. If you yourself have never read the transcripts of the 1978 Church vs. Good, Good vs. Dow and Rockwell case, I urge you to do so. You might also look at Carl Johnson's reports on these two accidents. Your doing this will enable you better to meet the public. In any event, be assured that you will get nowhere with the aware and affected public by perpetuating the myths that these were minor events which did little harm off site.

Response to Comment 126

The discussion of the 1957 and 1969 fires has been revised in the final plan to indicate that the estimated releases are DOE estimates that others claim are too low. Please refer to Responses to Comments 35, 36, 57, 74, 75 and 93.

Comment 127

The "Community Profile" provided on pp. 13-14 is strangely selective of what to include and what to exclude. We are given population estimates for the area within three miles of the plant, within five miles of the plant, but not within ten, though commercial developments within five and ten miles and the number of schools within ten miles are mentioned. Are there schools within five miles? What is the population within ten miles of the plant? This information should be included. Add a map with rings representing the three, five and ten mile distances from the plant. Also, the text is not clear what is meant by three, five, and ten miles from the plant. Is this measured from a point central to the facility, from the boundary of the 384-acre inner area, or from the boundary of the 6550-acre preserve.

Response to Comment 127

Please refer to Response to Comment 10 concerning population with 10 miles of the plant. As stated in the draft plan, the closest school is located approximately five miles from the plant.

The radial distances are measured from the center of the plant's developed area. Please also refer to Responses to Comments 8, 30 and 71.

Comment 128

The text should not say, as it does on p. 15, that the "shroud of secrecy" regarding plant operations "was accepted by the community." It was accepted by some of the community, perhaps even most, but never all.

Response to Comment 128

The statement has been revised in the final plan to reflect your comment.

Comment 129

What is the source of statistics given for the size of demonstrations pro and con in 1979 and 1983? Perhaps my memory fails me, but the figure cited on p. 15 seems a gross underestimate, the one on p. 16 inflated beyond imagination. Please send precise documentation for these figures and consider either omitting or rewriting this section in the interest of accuracy.

Response to Comment 129

The attempted encirclement of the plant took place on October 15, 1983. The Boulder Daily Camera's headline the following day read, 12,000 protest N-arms at Rocky Flats. The newspaper reported, "Under a startlingly clear Colorado sky, more than 12,000 people joined hands around the Rocky Flats nuclear weapons plant Saturday, calling for an end to the nuclear arms race."

The pro-nuclear rally was held on August 26, 1979. A Denver Post article on the event, 15,000 Go to Rocky Flats Pro-Nuclear Energy Rally, states, "The rally organizers said they counted 15,000 persons passing the gate to the rally southwest of Broomfield, and Lt. James A. Yarrington, of the Colorado State Patrol, put the figure at 500 more than that." In response to your concern about accuracy of the numbers, the final plan has been revised to state that, according to the Denver Post, the rally attracted close to 15,000 supporters.

Please also refer to Responses to Comments 41 and 85.

Comment 130

Does your text anywhere refer to the statement HUD once required prospective homeowners to sign about the existence of an emergency-response plan for the area? Shouldn't this be included?

Response to Comment 130

Reference to the HUD statement has been added to the Chronology of Community Involvement section of the final plan.

Comment 131

The section on "Key Community Concerns" mentions many valuable concerns without ever referring to the single most crucial one, namely, the lack of independent oversight of DOE and Rocky Flats. Where oversight does exist, as for instance with the Colorado Department of Health, information and access to information still are controlled by DOE. The very best monitoring will remain inadequate and the truth about Rocky Flats will never be known so long as DOE maintains its monopoly over information. The lack of fully independent oversight, including an end to DOE's control over information, means the CRP objectives to "enhance public knowledge," "encourage public involvement," and "provide a forum for resolution of community concerns" can never be fully met. On the surface, RCRA, CERCLA and IAG requirements may be satisfied. But this will not suffice to banish distrust. Only the truth will make us free. And there will be no assurance that we have the truth--all of us, you as well as I--until all barriers to all information have been removed. This requires, at minimum, independent, non-governmental oversight of every aspect of Rocky Flats, including all information from past, present and future. Please write this into the next version of the CRP.

Response to Comment 131

Indeed, the issue of independent oversight has and continues to be a key concern of some members of the public. A brief discussion of the issue has been added to the Public Information and Involvement Needs section of the final plan.

Comment 132

Appendix D lists the Boulder Public Library as an information repository. Is this already functioning?

Response to Comment 132

Because of uncertainties about the availability of space at the Boulder Public Library for an information repository, it has been removed from the list provided in Appendix D of the Community Relations Plan. DOE will consider establishing an information repository there in the future if the City of Boulder and library officials ask us to do so.

Comment 133

Finally, my name is misspelled on p. A1-12 of Appendix C and in Appendix A. Capitalize the "R" to make it LeRoy Moore. Thanks.

Response to Comment 133

The spelling of your name has been corrected in Appendices A and C. We apologize for the error.

COMMENTOR: Susan Nachtrieb, City of Westminster

Thank you for the opportunity to comment on the Rocky Flats Plant Community Relations Plan.

Comment 134

I would like to clarify a statement made on page four, under the Site Description of the plan, regarding the proximity of the Rocky Flats Plant to Standley Lake, the municipal drinking water supply for the City of Westminster. The plan states, "Additionally, Woman Creek drainage currently is intercepted by a dam on the plant site and directed by pipeline into Walnut Creek..." This statement implies all Woman Creek drainage is intercepted and routed to Walnut Creek. Only the drainage that is successfully collected by the South Interceptor Ditch and reaches Pond C-2 is diverted around Standley Lake by pumping the effluent up to the diversion around Great Western Reservoir. The flow in Woman Creek, which passes through Pond C-1, continues to flow into Standley Lake and currently is not diverted around Standley Lake. The Woman Creek flow may be impacted by the old landfill located upgradient and near Woman Creek and by seeps from the 903 Pad which potentially may not be intercepted by the South Interceptor Ditch. During the month of January of this year, a flow of over 8.9 million gallons of water were recorded at Pond C-1 which flowed into Standley Lake. The Option B water supply protection project includes an interceptor canal which will route the Woman Creek flow around Standley Lake, however, the interceptor canal is not in place at this time.

Response to Comment 134

The description has been revised to indicate that much, not all, of the Woman Creek drainage is intercepted and directed to Walnut Creek.

Comment 135

On page eight of the plan, a reference is made to plutonium-contaminated sediments in Standley Lake and that the tap water which originates from Standley Lake is routinely analyzed for plutonium. Clarification is needed for the statement, "Although the off-site reservoir waters consistently meet the state's drinking water standards..." The statement implies there is a State of Colorado drinking water standard for plutonium, which is incorrect. In addition, the new site specific radionuclide standards for Standley Lake and Woman Creek, which were adopted by the Water Quality Control Commission in February 1990 for the protection of the drinking water supply, should be included.

Response to Comment 135

Since correcting the statement would require a complex technical explanation of standards and limits for water released from Rocky Flats, the discussion of tap water and drinking water standards has been omitted from the final plan. Detailed information on applicable water guides, standards and limits can be found in the ***Rocky Flats Plant Site Environmental Report - 1989***.

Comment 136

Page 22 of the plan indicates the need to establish a Technical Review Group which would "...offer input in the early stages of planning for cleanup." Westminster is pleased the Department of Energy is supportive of early involvement of local government in the cleanup process and requests that a representative from the City of Westminster be appointed to the Technical Review Group. Additional definition and detail of the scope of the Technical Review Group within the plan would be appropriate and should include simultaneous review of draft documents with the Environmental Protection Agency and the Colorado Department of Health.

Thank you for the opportunity to comment on this document.

Response to Comment 136

DOE, EPA and CDH are exploring the possibility of future Technical Review Group review of draft environmental restoration documents. DOE believes this review can be productive and that it will only be limited by time available and IAG schedule constraints. Please also refer to Responses to Comments 14, 22, 28, 52, 55, 66 and 122.

COMMENTOR: Tom Rauch, American Friends Service Committee

Here are some written comments on the draft Rocky Flats Community Relations Plan. I was not able to attend the Public Comment Meeting on March 13, 1991.

Comment 137

The Rocky Flats Community Interview Plan: this plan was well designed and carried out. A wide range and variety of people were interviewed. The people who interviewed me took plenty of time and made extensive notes of my comments and responses.

Community Relations Activities: this list of activities--some of which are already being implemented--is very extensive. As all these activities are implemented, citizens will have access to increasing information about the plant and increasing opportunity to question plant officials and discuss concerns with them. This is a very positive development.

Much of the background information in the document--with some exceptions as noted below--is very helpful, e.g. Overview (pages 1-3), the various figures, Community Background (pp. 13-21). These pages bring together in concise form much information about the plant, its history and the complex cleanup process.

Response to Comment 137

Thank you for participating in the community interview process and for your positive feedback.

Comment 138

Plant History (pages 4-8) also provides a helpful summary. But it should be noted that there are widely divergent views of the amount of plutonium escaping from the plant due to 1957 and 1969 fires (see, e.g., Dr. Carl Johnson's "Comments on the 1957 Fire at the Rocky Flats Plant, in Jefferson County, Colorado") and the leaking waste drums (see S.E. Poet and E.A. Martell, "Plutonium-239 and Americium-241 Contamination in the Denver Area", Health Physics, Vol. 23 (Oct., 1972), 537-548). So the history section should indicate the greatly differing estimates, especially because citizens rightly mistrust information provided when the wall of secrecy surrounding plant operations was almost impenetrable.

Response to Comment 138

We have acknowledged the differing views in the final plan. Please also refer to Responses to Comments 35, 36, 39, 57, 74, 75, 79, 93, 95, 110 and 126.

Comment 139

Chronology of Community Involvement: what is the source for the figures given on pages 15 and 16 for the two large demonstrations at the plant? Do all newspapers and police estimates agree on these figures?

Response to Comment 139

Please refer to Responses to Comments 41, 85 and 129.

Comment 140

The draft Rocky Flats Community Relations Plan represents a welcome and different attitude towards informing and involving the public regarding some activities at and decisions about the plant. But given the past history of secrecy and misinformation at the plant, the public will never be reasonably certain that it is receiving all information it should about health risks, environmental contamination, waste management, etc., until some outside agency has full independent oversight of the plant. Such a policy change is not within the range of the Community Relations Plan, but I think this caveat should be noted for the record.

I appreciate the opportunity to comment on the draft Rocky Flats Plant Community Relations Plan.

Response to Comment 140

A discussion of the need for independent oversight as identified by members of the public has been added to the final plan. Please also refer to Response to Comment 131.

5.0 RESPONSES TO VERBAL COMMENTS

COMMENTOR: Barbara Moore, Front Range Alternative Action Group

Comment 141

We've been told by the Department of Energy and EG&G and others that this Community Relations Plan is one of the best community relations plans in the nation. It really is a sad commentary to the importance of a community relations plan to say this. After the many interviews EG&G and DOE have conducted, and a tremendous amount of compiling of information, DOE has come up with a whopping 33 pages of document and this 33 pages of document fails miserably to meet the needs of the surrounding communities of the Rocky Flats Plant. If this is the best CRP the DOE has, I sure would hate to see the worst that they have.

Response to Comment 141

Please refer to Response to Comment 124.

Comment 142

The site description in the CRP is in grievous error, and I will be submitting a proposed replacement for several of those paragraphs. One error in this description, and one that has been repeatedly discussed at these different hearings, is the fact that the nearest community is one mile from the plant, not six miles. If the DOE would look outside their boundaries, they would find this out. There are houses, farms, schools and businesses all within a two-mile radius of this plant.

Response to Comment 142

The draft plan notes that there are some farms, ranches, houses and businesses within a few miles of the plant. DOE is not aware of any schools that are located within five miles of the plant, as measured from its center. Please also refer to Response to Comment 29.

Comment 143

The plant history is seriously flawed in this CRP and in no way represents a truthful and accurate historical record of the Rocky Flats Plant. The citizens of this community are well informed as to what the actual history of this plant is, and the description in the CRP is an insult to our intelligence and our knowledge. More importantly, it downplays the seriousness of the accidents, spills, burials and dumpings of tons and tons of radioactive hazardous waste over the past 39 years.

Response to Comment 143

Please refer to Responses to Comments 34, 90 and 105.

Comment 144

The CRP talks about the Administrative Record, and this record is still not intact in a library. It is a requirement of the IAG that this record be maintained and kept intact and is one of the few resources the community has of researching and finding out how the activities and cleanup activities are progressing at the plant. Without this record being kept intact at all times, it is a great handicap to the communities and the researchers that are looking into these issues.

Response to Comment 144

Please refer to Responses to Comments 44 and 120.

Comment 145

I have a real problem with the Community Relations Plan and the IAG in the fact that it provides no medium or mechanism for enforcement of the regulations for the public. The EPA and CDH have a dispute resolution; the public and the communities are just out on a ledge. If we do not like what is going on out there, and we see a serious fault in it, our only recourse is a civil lawsuit.

The IAG was developed to keep DOE out of court. We also need a mechanism to keep the communities from suing DOE and have a dispute resolution so we can sit down and discuss these differences together instead of going to the courts. I think that would be a waste of our time and DOE's time and a waste of our resources. The true point of the IAG is to keep DOE out of courts and on to cleanup. We also need that for the citizens. I strongly suggest and urge that the Department of Energy, EG&G, CDH and EPA establish a Citizen Dispute Resolution Committee that has the same power and the same dispute resolutions as the EPA and CDH already have.

Response to Comment 145

Please refer to Responses to Comments 67 and 117.

Comment 146

In regard to the responsiveness summaries, the responsiveness summaries must be made available on a more timely basis. These summaries also must include, in one document, all written and oral testimony. At this time the written and the oral testimonies are kept in separate documents. I find the segregation of the two testimonies to be a hardship for us and for the communities that need to know what all the comments are. So, I would strongly urge that all

comments, written and oral, be included in the responsiveness summaries and that these responsiveness summaries be produced on a more timely basis.

Thank you for your time this evening. I will be submitting a more complete plan in the future.

Response to Comment 146

DOE understands your desire to receive responses to your comments on a timely basis. The responsiveness summaries for environmental restoration documents, however, are developed according to the schedules established in the Interagency Agreement.

Certainly DOE's recent responsiveness summaries have included both written and oral comments, as does this one, and we intend to continue this practice.

COMMENTOR: Paula Elofson-Gardine, Concerned Health Technicians for a Cleaner Colorado and Rocky Flats Cleanup Commission

I am the director and spokesperson for Concerned Health Technicians for a Cleaner Colorado. I also am an officer on the board of directors for the Rocky Flats Cleanup Commission. Joe Tempel, however, is the spokesperson for that group.

I have a number of concerns that I would like to bring to your attention that are serious flaws in this report. I will be submitting written comments since they are too numerous to enumerate tonight.

Comment 147

I think the most alarming concern about this report is the mischaracterization of the history of the plant, as Barb said. I would support her in her assessment that it's a travesty and an insult to those people that are informed citizens and that are well aware of the history of this plant.

Specifically, on pages nine and seven, I would cite that your significant event descriptions of 1957 and 1969 are so seriously flawed, I would urge you to go back to your history books and internal memos.

I would cite the criticality safety assessment internal memos and the appendices of that report, the 1980 EIS, the Health and Safety Lab DOE Krey and Hardy report, the NCAR Poet and Martell report of plutonium-239 and americium-241 contamination of the Denver area, and comments on the 1957 fire by Dr. Carl Johnson, which extrapolates that the release and dust loading of destroyed banks of HEPA filters alone from the 1957 fire is equal to approximately 15,337 curies of plutonium released to the public. And, since they turned off the monitors or had no monitoring capability for over a week, eight days after the fire they still had a 13,000 microcurie release, which exceeded 16,000 times the daily release permissible. I'd say that says enough in itself, wouldn't you?

And, the release that they cite in this report for the CRP is 26,000 microcuries. I'd say there's a little bit of a discrepancy when the transuranium elements in the environment report by the DOE itself in 1977 listed fourteen curies offsite--or excuse me, 10 onsite and four offsite, which amounts to 22.8 million lethal doses or 22--excuse me, 228 grams of plutonium. I'd say that's enough to concern any close in resident, wouldn't you?

Response to Comment 147

Please refer to Responses to Comments 35, 36, 57, 74, 75, 93, 126 and 138.

Comment 148

On to other areas of this report, on page nine you list that plutonium particles can barely penetrate the skin surface and can be completely stopped by a sheet of paper. One of our affiliates with the Cleanup Commission apparently questioned your author of this report, who

stated that yes, that's correct, we only deal with alpha radiation out at the plant, and I'd say that is an outright fallacy. If this person is that sadly misinformed, I hope you'll put this person through retraining.

Since your own quarterly report, I will cite this health physics report, radioactive materials associated with the Rocky Flats Plant monthly information exchange meeting, if they look at their own data, it shows you have alpha and beta and gamma emitters. I would specifically refer you again back to the criticality safety assessment report of 1989, I believe, in which they found one of your ducts had such serious americium contamination that they were wrapping it in lead shielding in an attempt to ameliorate the gamma radiation that was being exuded by that.

Also, the EPA has a report that they put out in 1977 - Transuranium Elements in the General Environment, Proposed Guidance for Dose Limits for People Exposed from 1978 - and EPA's estimate was 11 curies of plutonium and one curie of americium released with concentrations offsite. So I would urge you to do some correction and back stepping on these reports so that you don't continue to a) insult the public and b) take us for a bunch of imbeciles.

Response to Comment 148

Please refer to Responses to Comments 59, 83 and 97.

Comment 149

Past reports did not include newsletter information for organizations to be involved with. I would say that as members of the Rocky Flats Cleanup Commission who are specifically focused on cleanup of the facility, I think it's unfortunate that the Technical Assistance Grant group was not allowed to be intimately involved in the cleanup newsletter process with regular columns, etc. for an independent input to the process.

Response to Comment 149

Please refer to Response to Comment 65.

Comment 150

I have some other comments here. I think that there is some concern that there has been a failure on the plant's part to address the residues in the drums. I realize that's not completely in the CRP. However, in the characterization of how much you have to deal with here, there is some real concern, again, with dispute resolution, as Barb brought up, that we do have an opportunity for some relief beyond going to the courts.

Since these relative amounts of radionuclides are such that if you have barrels that have thousand gram limits, and your sodium iodide detection in the criticality safety assessment, appendices D, show that you had a fluctuation of plus or minus 3,000 grams of plutonium per

barrel, if you have 61 curies per barrel, if it's only got 1,000 grams of plutonium in it, I think that this is a significant concern in terms of waste and waste storage and waste treatment issues, that still have yet to be addressed.

So, I feel that the total picture here is still being obscured by what I would call the cooptation plan of the public. Thank you.

Response to Comment 150

Regarding your comment about dispute resolution, please refer to Responses to Comments 67, 117 and 145. Current waste storage and treatment issues are outside the scope of this Community Relations Plan.

COMMENTOR: Joe Tempel, Rocky Flats Cleanup Commission

Comment 151

I just have a few comments tonight. The main one I'd like to ask is that the Rocky Flats Cleanup Commission be placed on the Technical Review Committee that is identified in the Community Relations Plan. We feel like we have a lot to offer from a technical standpoint and we'd like to participate on a regular basis.

Response to Comment 151

DOE welcomes the participation of the Rocky Flats Cleanup Commission in the Technical Review Group. Please also refer to Responses to Comments 14, 22, 28, 52, 55, 66, 122 and 136.

Comment 152

I would also like to emphasize that we would hope that the update that DOE puts out on a regular basis is more of an open forum for the public to comment, not just the Cleanup Commission, but anyone would have an opportunity to submit an editorial to that paper so that it can get wide distribution for public dialogue to continue.

Response to Comment 152

Please refer to Responses to Comments 65 and 149.

Comment 153

I'd like to recommend that there is some kind of a dispute resolution process for citizens if they do disagree with certain decisions made at the plant.

Response to Comment 153

Citizen involvement in disputes may be achievable, but ultimate responsibility rests with DOE, EPA and CDH by law. Please also refer to Responses to Comments 67, 117, 145 and 150.

Comment 154

One in particular that the Cleanup Commission still is not comfortable with is the lack of enclosures placed around excavation activities at the plant. These enclosures are not only to protect the workers who should be in at least Level D protection, but also the surrounding community. With the winds the way they blow out at the plant, and the lack of total knowledge of what would be encountered during these excavations, I think it behooves the plant and the public to require that these enclosures be in place while excavation occurs at the plant. But this is

just one of the items where we feel an adequate dispute resolution process is required to get a full airing of the issues.

Response to Comment 154

The Community Relations Plan includes public concerns about resuspension of plutonium during cleanup activities in the discussion of key community concerns in Section C, Community Background. The plan does not, however, set policy or procedures for the technical aspects of environmental restoration. DOE suggests that this comment be offered during review of the technical documents in which excavation activities are described.

Comment 155

I would like to thank Beth [Beth Brainard, DOE Rocky Flats Public Affairs Officer] for putting together this document dated February 28th, which documents our consensus that we reached at a meeting on how to conduct informational meetings. I think it is a good start that should be applied to any meetings that are conducted, not only by DOE or EG&G, but whether it's an Ahearne or Conway, and I know you've sent it on to those organizations, and I thank you for putting that together. Hopefully, it will streamline and make less awkward some of the experiences we've had in the past.

And, finally, we'll be submitting some corrections or additions to some of the statements made in the Community Relations Plan with regard to the level of contamination at the plant that has been previously alluded to this evening. Thank you.

Response to Comment 155

Thank you for the positive feedback on the February 28, 1991, consensus document.