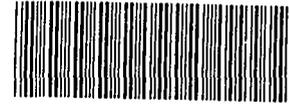


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Rockwell
International



000025398

Rocky Flats Plant
North American Space Operations
Rockwell International Corporation
P.O. Box 464
Golden, Colorado 80402-0464
(303) 966-7000

Contractor to U.S. Department of Energy

SEP 3 1987

87-RF-3728

Albert E. Whiteman
Area Manager
DOE, RFAO

Attn: R. D. Reed

EPA PROPOSED INTERIM GUIDANCE ON TRANSURANICS IN THE
ENVIRONMENT

Per the August 26, 1987, request of John G. Themelis,
Director, Environment and Health Division, DOE-AL, the Rocky
Flats Plant Health, Safety and Environment Department has
reviewed the subject document, and our comments are attached.

DOE-AL has requested that comments be sent directly to Carl
Welty, DOE Headquarters, EH-231, with a copy to John Themelis
by September 4, 1987. If you have any questions on these
comments, please contact Nancy M. Daugherty, x7005, or my
Environmental Management Section.

George W. Campbell
George W. Campbell, Director
Health, Safety and Environment

Orig. and 2 cc - A. E. Whiteman
Enc.

DIST	LTR	ENG
ANCHINI, D J	X	X
ADER, C P		
AMPBELL, G W	X	X
OOD, R C		
INZER, J E		
IRBY, W A		
ANGHEIM, G R		
IGNETT, J F		
MEYERS, G W	X	X
HANNON, W M		
MITH, R E		
EIDNER, W F		
ESTON, W F		
ILSON, G L		
OZNIAK, B D		
OUNG, E R		
ETCHER, D M		
ARNIVAL, G J		
HANDA, R N		
RIEBERG, K		
ARM, L K		
EBERT, J L		
OEY, J S		
OFFMAN, R B		
RIEG, D M		
IM, B W		
UDENBURG, D E		
ICHEL, W B		
AIMON, E R		
EWBY, R L		
URNER, H L		
ELASQUEZ, R N		
CORRES CONTROL	X	X
Daugherty, N.M.	X	X
Wabocher, D.D.	X	X
Winton, F.P.	X	X
McClellan, M.L.	X	X
Miller, G.L.	X	X
Hack, G.H.	X	X
MF	X	X
CLASSIFICATION		
CLASSIFIED		
CONFIDENTIAL		
SECRET		

WITH CLASSIFIER SIG.
[Signature]
9/3/87

IN REPLY TO LTR. NO.
512-RF-87

APPROVALS

OPERATOR & TYPIST INITIALS
MD/dlb
16469 (Rev. 3/87)

ADMIN RECCRD

SW-A-002935

ROCKY FLATS PLANT
HEALTH, SAFETY AND ENVIRONMENT DEPARTMENT
COMMENTS ON
"INTERIM RECOMMENDATIONS ON DOSES TO PERSONS EXPOSED TO
TRANSURANIUM ELEMENTS IN THE GENERAL ENVIRONMENT"

3 September 1987

GENERAL COMMENTS:

Over a number of years the Rocky Flats Plant has participated in the development, formal and informal review, and public hearings associated with the proposed interim recommendations. We concur that guidance is needed and are pleased that EPA is proceeding with issuing interim recommendations.

No significant near-term impact is expected from the proposed interim recommendations for the Rocky Flats Plant. Offsite contamination as a result of Plant activities is below the screening levels which are given in Recommendation 15 (page 6) for both soil and air concentrations. In addition, the State of Colorado already has a standard for plutonium concentrations in soil which is more restrictive than the proposed recommendations and which is being used as a court-directed guideline for offsite remediation activities. The State standard calls for restrictions on construction activities when plutonium concentrations in soil exceed 2 disintegrations per minute per gram. Remediation activities currently are in progress to reduce offsite soil concentrations to below the State standard.

SPECIFIC COMMENTS:

p. 3, Recommendation 4.

In order to provide consistency among all nuclear facilities based on current recommendations of the International Commission on Radiological Protection (ICRP), the radiation protection guides should be based on effective dose equivalent for limiting stochastic effects, with individual organ limits given only for protection against non-stochastic effects. The dose conversion factors that are to be used should be specified, and they should be based on current ICRP guidance.

p. 13, Table 1.

The Approximate Inventory (8-10 Ci) given for the Rocky Flats Plant appears to include both onsite and offsite plutonium contamination. Current estimates of offsite plutonium inventory for the Plant range between 3 to 6 Ci. The numbers in Table 1 should be changed or clarified.