

STATEMENT



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IDENTIFYING VIEWS AND ISSUES ON
THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
ROCKY FLATS PLANT SITE, ERDA 1545-D

by the

PRESIDING BOARD

July 11, 1978

I. Introduction

As provided by the notice of hearing issued Monday, April 24, 1978, 43 Fed. Reg. 17391, the public hearings announced in connection with the Draft Environmental Impact Statement - ERDA 1545-D (DEIS) on the Rocky Flats Plant Site, Jefferson County, Golden, Colorado, (hereafter RFP, or Plant) were held on May 24-25, 1978 at Denver, Colorado. The hearings were conducted by the Presiding Board (Board) established for this proceeding in accordance with the rules of procedure set forth in the notice.

Extensive comments on the DEIS were received from a number of federal, state and local government agencies, from private organizations, and from individual citizens.^{1/} The Board has reviewed the impact statement in light of the comments made, including the staff responses to these comments.^{2/} In accordance with the notice of hearing, the Board

1/ Many of the written and oral comments raised identical or similar issues. In order to render this report in a timely manner, the Board did not reference all the participants who addressed a specific issue, nor did we cite every reference to an issue; instead, such references as are included are by way of example only. Participant's titles are omitted after first occurrence.

2/ Staff Statement in response to comments received on the DEIS, dated April 1978. Therein the staff has indicated agreement with many of the comments raised and stated its intent to amend the FEIS accordingly. Obviously differences of opinion exist as to the issues raised and must be resolved.

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has identified only those issues which it considered to be critical to future decision-making involving the Rocky Flats Plant Site (RFP). In identifying these issues, the Presiding Board does not presume to judge their merits and does not undertake to render judgment concerning the course of the operations. This report, along with copies of the transcripts, oral and written comments and questions submitted to the Board by members of the public, organizations and Government agencies, and the list of exhibits attached hereto (Appendix A) including the written responses of the staff to the questions raised in the hearings, constitute the record of this public hearing. Concurrent with the submission of this report and record to the Acting Assistant Secretary for Environment, Department of Energy (DOE) it is being sent to the Director, Office of NEPA Coordination for placement in the Department's public document rooms.

II. Unresolved Issues

- A. Several issues were identified most frequently by the participants as critical to future decision-making on the Rocky Flats Plant Site. The first is in effect a challenge to the issuance of the DEIS because it does not analyze the activities of the RFP as one component of the national nuclear weapons program nor discuss and evaluate the assumptions for continued operation of RFP based on the needs of the national nuclear weapons program.

This issue was further defined as whether the National Environmental Policy Act (NEPA) requires an analysis and discussion of the entire nuclear weapons program within the DEIS because of, and as a part of, the assumptions stated in the DEIS to the effect that the production of nuclear weapons would continue indefinitely. As an alternative, the participants raising this issue^{3/} would require the preparation and issuance of a separate environmental impact statement covering the entire nuclear weapons program. They were of the opinion that a NEPA impact statement as to the RFP can be meaningful only within the context of an environmental impact analysis of the national nuclear weapons program. They stated that such a broad general analysis could conceivably result in a decision to curtail or stop further nuclear weapons production and thus reduce or eliminate the need for the RFP.

On the other hand, the staff is of the opinion that the DEIS, as a site-specific environmental impact statement, meets the needs and requirements of the NEPA^{4/}. The staff noted that the

3/ For example, see Tr. 24,25, Dr. A. Robbins, Colo. Dept. of Health; Dr. D. Filley, COSC; Mr. A. Roisman, NRDC; Mr. C. Aron, SANE, Ms. F. Cohen, M.A.P.; Mr. P. Kiepe.

4/ Tr. 94,95,178, Mr. H. Roser.

mandate of DOE is to fulfill U.S. nuclear weapons production requirements as imposed by the Congress and the President, and that DOE has no role as to deployment and use of such weapons systems. However, the staff recognized the issue noted and pointed out that it is now under advisement.^{5/}

A related issue, the need for discussion of the statutory and policy authority for the continued operation of the RFP, was voiced. As to this issue it would seem that the legal authority for the continued operation of the RFP should be addressed and more adequately discussed in the Final Environmental Impact Statement (FEIS).

- B. Another general issue states that the DEIS is inadequate in its analysis and discussion of alternatives to RFP. This issue challenges the adequacy of the DEIS in its cost-benefit evaluation of two such alternatives: (a) the option of terminating all activities there,^{6/} and (b), the option of converting the facility to other uses.^{7/} The essence of this issue is that the cost-benefit balance for the RFP is "nonexistent" and has

^{5/} Tr. 102-107, 179-181, H. Roser; Staff Statement, p.4

^{6/} Tr. 196-199, Dr. J. Cobb; Prof. P. Wehr; Mr. J. Pekarek; Ms. N. Herish; Ms. E. Lui.

^{7/} Tr. 24-27, A. Robbins; Mr. R. Herrick-Stare; Mr. F. Anders; Mr. J. Jurie; Mr. R. Young

never been evaluated since the "benefit" is an "assumption" which has not been evaluated, and the "cost" of removing the plant or reconverting the plant site does not include or adequately evaluate relevant factors such as:

- (a) the proximity of RFP to downtown Denver, (16 miles) and to some of its suburbs (5 miles); ^{8/}
- (b) the RFP is upwind and upstream from Denver; ^{9/}
- (c) it is in the path of rapid housing growth; ^{10/}
- (d) hazards of transportation accidents; ^{11/}
- (e) hazards of flooding; ^{12/}
- (f) the safety and integrity of transuranic storage facilities, including waste; ^{13/}

8/ DEIS pp 1-5, 2-10, 2-22; Tr. 26, A. Robbins; D. Filley; J. Cobb,

9/ DEIS pp 2-22 to 2-42; 2-80 to 2-90, Dr. N. Helburn; J. Pekarek

10/ Tr. 26, A. Robbins; F. Anders; J. Pekarek; N. Helburn

11/ Tr. 28, A. Robbins; P. Wehr; F. Anders; A. Robbins; Ms. A. Parks

12/ Ltr. from P. Cook to W. Pennington, Jan 27, 1978; Ltr from F. Rozich to A. Robbins, Nov 28, 1977 as submitted by A. Robbins.

13/ Tr 456 A. Parks; Tr 479 N. Mullen; Tr 28 A. Robbins

- (g) hazards of inplant accidents which may release radioactive materials;^{14/}
- (h) the economic burden on State human service agencies for monitoring soil, air, etc. - police, fire and health departments;^{15/}
- (i) an Emergency Response Plan,^{16/}
- (j) assessment of the benefits of uses for the plant other than for production of nuclear weapons, such as solar energy research facility, etc.^{17/}

Accordingly, a number of participants concluded that, in their view, the DEIS does not justify the continued operation of RFP, and therefore it should be gradually phased out of its present mission and converted into a solar or other similar research use.

^{14/} Tr. 405-414, J Pekarek; Tr. 456, A. Parks; Tr. 68, Dr. C. Johnson; Tr. 355, P. Smith

^{15/} Tr. 30, A. Robbins; Tr. 240-247 Ms. E. DeChavendes; Tr. 407, J. Pekarek Tr. 421. K. Partridge.

^{16/} Tr. 27 A. Robbins; A. Filley; R. Young; J. Cobb

^{17/} Tr. 157-161, Dr. L. Dumas; Mr. D. Ford; C Aron; Mr. C. Lehrburger

C. Unresolved issues on health effects were frequently mentioned. For clarity the Board has grouped such issues, where possible, into a number of related categories.

1. Assessment and control of effluents (solid, liquid, and airborne) from the Plant, both for normal and accident conditions;

(a) Routine releases from the operating plant. Although the DEIS indicates that the annual routine releases will be kept very low, (on the order of $6/\mu\text{Ci}/\text{yr}$), the systems and methods for accomplishing this objective were not explained in detail and were considered inadequate by a number of participants.^{18/} Therefore, a better description of the engineering aspects of effluent control (especially to the atmosphere) is needed in order to address the concerns expressed by many participants, including the Colorado State Department of Health. This would also apply to the justification in the DEIS for "any" exposure. Stating that steps have been taken far beyond those which might be considered adequate to minimize routine effluents is not sufficient. It is necessary that such steps be clearly documented.

^{18/} Tr. 456, A. Parks; Tr. 408-409, J. Pekarek; Ltr. from P. Cook to W. Pennington, Jan 27, 1978

In addition, in view of other similar concerns, it is suggested that the FEIS address not only the subject of HEPA filter performance, but also provide a more general background discussion of the effectiveness of filters for small particles, including those less than 0.3 microns (as referenced in the Staff Statement, pp. 20).

- (b) Accidental releases. Although one of the appendices discusses the scenarios of a variety of accidents and gives calculations both of the probability and the size of the source terms which might be involved, there is limited discussion in the DEIS of the methodology employed for such analyses and of the strengths and shortcomings of the methodologies used. These short-comings were the subject of comments by several participants.^{19/}

The degree to which given methodologies have been used, the advantages and disadvantages of the methods and the degree to which the results of the use of such methodology is factored into the prevention of

^{19/} Tr. 372-377 Dr. F. Martell; Tr 452 A. Parks;
Tr. 356, Mr. P. Smith, EPA; Tr 483, Dr. M. Spector; Tr 412-415,
J. PeKarek

accidental releases should be discussed in the FEIS perhaps as an expansion of Appendix I of the DEIS.

A description of the risk of potential exposure from accidents is set forth in the DEIS through analyses of various scenarios without an adequate showing of the effort made to prevent such accidents. The FEIS should more fully discuss actions taken to encourage prevention of accidents (which could lead to release of radioactivity) including: the engineering measures adopted (such as multiple redundancy in filter banks); any administrative actions such as inspection schedules; procedures for filter bypass leakage testing; and fire prevention and mitigation programs.

- (c) Emergency Response Plan. Concern was repeatedly expressed that the emergency response plan with the State of Colorado is not evaluated in the statement.^{20/} It was noted that because such a plan may have the

^{20/} Tr. 163-168, R. Young; Tr. 309, Mr. J. Matis; A. Robbins; R. Herrick-Stare; Ms. K. Partridge; Comment Ltr. # 3, NRDC (Dr. Tamplin)

effect of ameliorating the potential impact of accidents, it is therefore relevant to the continued operation of the plant and should be addressed.

We recommend that the plan, even though it may be the responsibility of the Colorado State Department of Health, be described in the FEIS. The staff should also consider an assessment of the effectiveness of the plan on mitigating the consequences of accidents.

2. Evaluation of the environmental transport (air, food, soil, water) and health effects for man and animals.
 - (a) The staff has agreed that the calculations of dose from plutonium emissions are not adequately documented and will be redone.^{21/} The reliance on whole body doses to provide general perspective was frequently questioned, and as pointed out by a number of participants and agreed to by the staff, specific organ doses, primarily to lung, liver, and skeleton, are required in calculating for plutonium and other actinides.^{22/} The assumptions under which these

^{21/} Staff Statement, p. 7-14; Tr 26 A. Robbins; Ltr. from A. J. Hazle to R. Simsick, Nov. 28, 1977; Tr 362, Mr. R. Foulk; J. Cobb; C. Johnson

^{22/} Tr. 355, P. Smith; Comment letter A. Robbins #17, Tr. 359. To include a discussion of gonadal doses.

recalculations are performed should be clearly identified by the staff and should take into account the comments received.

- (b) Many participants expressed concern that the DEIS did not adequately address the issue of potential doses to local populations within 10 miles of Rocky Flats Plant and especially within 5 miles.^{23/} Since it would appear that the highest individual doses from normal or accidental releases would be delivered to these local populations, the FEIS should address such potential impacts in more detail, especially as to dosimetric calculations.^{24/}
- (c) Familiarity of the reader with the state of knowledge of the transport of plutonium from soil to man is assumed by the authors of the DEIS. While this subject has been addressed in several scientific reviews, nevertheless, it would be helpful to include an appendix discussing the state of knowledge of transport of plutonium from soil to man in the FEIS.

^{23/} Tr. 17, Mr. D. Ehrman; Tr. 57,61,72 C. Johnson.

^{24/} Tr. 57,61-62,71-74,362. The staff agreed to discuss this matter in greater detail.

Consideration should also be given to including transport by wind and by water in this particular appendix. Also in this regard, the subject of past releases and consequent accumulation in soil including future does commitments should be adequately addressed in the FEIS, especially for populations residing near the plant. ^{25/}

3. Assessment and control of the health risks to man and biota.

- (a) The DEIS was criticized by some participants because of its failure to place uncertainties with respect to potential health effects in perspective. ^{26/} In this regard, giving a range of doses, as well as an expected dose should be considered for the FEIS. In addition, while comparison to background from the point of view of putting possible or calculated exposure into perspective is a justifiable and proper technique, nevertheless, comparison to

^{25/} Tr. 17 D. Ehrman; Tr. 26 A. Robbins; Tr. 57-68, C. Johnson; The staff has agreed to address doses to local populations in greater detail. The presentation of complex technical issues in the DEIS is sometimes too abbreviated and complex even for experts. An example of this is the question of the current state of knowledge on soil liits. Consideration should be given to treating such complex technical issues as may require detailed explanations in appendices to the main text. This would also improve the brevity and readability of the main text.

^{26/} Mr. A. Hazle, attachment to comment Ltr. #17; But see Appendix G, DEIS.

background alone is not sufficient justification for such exposure.^{27/}

(b) The model used to estimate biological effects in man, given estimated exposures to radiation, was questioned several times during the hearings. The staff relied on professional evaluations in the literature such as the NAS Committee on Biological Effects of Ionizing Radiation (BEIR) for the basis of their risk estimates.^{28/} Apparently, many participants either did not understand, or agree with, the linear no-threshold dose response model used in the DEIS and therefore some adopted a non linear or threshold model for purposes of their evaluation. Accordingly, a more complete discussion of the linear hypothesis threshold and other forms of radiation dose response relationships should be included.

(c) For purposes of this report the Board notes that radiation protection standards may be described as "derived" and "basic." Derived standards relate to

^{27/} This rationale, as found in the ICRP #26, (International Commission a Radiological Protection, Report #26) is that the justification process consists first of showing that a benefit is associated with the activity; there then needs to be an analysis of whether further expenditures of money would be efficient in terms of reducing potential harm.

^{28/} Tr. 372, E. Martell; Tr. 190, J. Cobb; Tr. 505 M. Spector Tr. 51, R. Herrick-Stare; Tr. 257, W. Evans. The staff agreed to discuss this subject.

concentrations in air, water, soil and food, whereas the basic standards define radiation doses (and risks) to man. A better description of the relationship of one to the other is needed to clarify this subject in the DEIS. To this end it should be noted that whereas standards for air, water and food exist nationally, internationally, and within DOE directives, soil is the most difficult media for which international and national standards do not exist.^{29/} Accordingly, a separate discussion of the origin of soil limits is suggested.

- (d) Concerns were expressed that occupational worker protection was not adequate.^{30/} This issue should be clarified in the FEIS.
- (e) Concerns were expressed with respect to biological concentration in grass, local biota, fish and cattle, and for potential effects in these biota.^{31/}
A supplementary statement or appendix should include these concerns and sufficient detailed results (in addition to the list of site specific studies found in

29/ A. Hazle, attachment to comment Ltr #17.

30/ Tr. 59, C. Johnson.

31/ Tr. 168, R. Young; Tr. 260, N. Helburn; Tr. 286-8, L. Mehlhoff. The staff has agreed to address these concerns

the DEIS 3-24) to demonstrate that site-specific aspects have been addressed. The work of F. W. Whicker in particular conducted on the site on the radio-ecological cycling of plutonium is germane and should be included as part of such appendix.^{32/} In addition, the results of measurements of plutonium content in cattle, locally and distant, should be included.

4. Another unresolved issue relates to the degree of seismic safety of the Rocky Flats Plant.

(a) Recent information developed by the Colorado Geologic Survey suggests that the Golden fault located in the vicinity of Golden, Colorado, south of the plant site, is "active.", while the DEIS, on the other hand, indicates that this fault is inactive.^{33/} This issue, i.e., the capability of the Golden fault, or any other fault in the region, should be specifically addressed in the FEIS.

(b) Concerns were expressed that the Rocky Flats Plant may be vulnerable to seismic shaking, and that it does not conform to seismic standards used for nuclear power plants. Whether or not the seismic standards to

^{32/} "Radioecology of Natural System", Dr. F. W. Whicker (enclosure to comment Ltr. #8

^{33/} Tr. 343-344. Mr. R. Kirkham; Letter from Wm. P. Rogers to P. H. Schmuck dated Nov. 16, 1977; see also DEIS pp.2.43 through 2.46; p. 2.78,2.78.

be used should be those applied to nuclear power plants is an unresolved issue which should be addressed in the FEIS.

- (c) Some participants expressed concern that the earthquake potential of the RFP requires that the present facilities be backfitted to conform to seismic standards so as to preclude the release of any hazardous substance in case of earthquake.^{34/} This issue should likewise be addressed in the FEIS.

The staff indicated that a contractor-consultant will investigate the earthquake potential at Rocky Flats Plant, and will prepare and issue a report thereon. While the plant has not been analyzed for seismic safety using modern techniques, such an effort is to be included within the investigation.^{35/}

- (d) The timing of the consultant's seismic related findings and report, relative to the preparation and issuance of the FEIS, was another issue.^{36/} The concern expressed was that the seismic consultant's report and the staff comments based thereon should be made available for public comment before the FEIS is prepared on this point. Therefore, several

^{34/} Tr. 348; Rogers Letter supra, fn

^{35/} Tr. pp. 351-352, R. Kirkham.

^{36/} Tr. 350-352, R. Kirkham

suggestions were made that the effort to investigate the seismic issues posed be commenced at the earliest possible time.

5. Relative to the cost benefit of the various alternatives to the RFP, several participants commented on the failure of the DEIS to adequately treat the impact of the Rocky Flats Plant on current land use plans, including land devaluation, and siting of residential and commercial developments near the site.^{37/} For example, the statements in the DEIS that there is no conflict between Rocky Flats Plant and current land use plans should be clarified.^{38/}

The analyses and demographic projections for the area adjacent to the Rocky Flats Plant^{39/} were challenged as unrealistic. Because of the extremely rapid development of the entire Denver area, it is recommended that this subject be amplified in the FEIS to include the staff's best estimates of prospective loss of state and local tax revenues as may be related to the presence and operation of Rocky Flats Plant.

^{37/} Tr. pp. 265-267; N. Helburn; Tr. 51-52 D. Filley; N. Hersh Tr. 135-141; E. DeChavendes Tr. pp. 239-248; J. Matis Tr. pp. 308-309.

^{38/} DEIS pp. 1-17

^{39/} Tr. 354-357, P. Smith

6. The effects of wind erosion on the Rocky Flats Plant is another unresolved issue. Some participants felt that the DEIS did not adequately address the entire wind meteorology subject, and expressed concern that the strong wind action in the Rocky Flats Plant area had been largely ignored.^{40/} The staff noted that pertinent information on wind erosion has been previously published in the open literature, however, they agreed to clarify this issue in the FEIS.^{41/}
7. A number of participants objected to the estimates of maximum credible accidents analyzed as being erroneously underestimated. The staff indicated its intent to reexamine this subject to assure accuracy. It is recommended that such reexamination, including the criteria used, be made as clear as possible to the public and incorporated in the FEIS.^{42/}
8. Transportation of radioactive materials into and out of the Rocky Flats Plant is a major hazard in the view of a

^{40/} Tr. 261, N. Helburn; EPA comment Ltr. pp. 19-20.

^{41/} Staff Statement, p. 25;

^{42/} Tr. 27, A. Robbins; Tr. 52 R. Herrick-Stare;
Tr. 74, C. Johnson; Tr. 291 F. Anders.

number of participants and has not been adequately evaluated.^{43/} The issue of planes flying over the site was repeatedly mentioned as a hazard with recommendations that such airspace be "controlled" and barred to all flights.^{44/} While the transportation of plutonium by air has been terminated,^{45/} a number of comments were directed to the need to fully evaluate the transportation of radioactive substances into and out of the Rocky Flats Plant, including the routes and types of transport involved, and the adequacy of the containers used.^{46/}

9. Also of concern to a number of participants was the possibility of terrorist activities affecting the Plant.^{47/} They specifically criticized for example, the adequacy of perimeter patrols; adequacy of safeguards; and the failure to obtain "controlled air space" designation for the air space over the RFP.

One participant noted that while the security of the RFP had improved under the present contractor, the very nature

43/ Tr. 28, A. Robbins; Tr. 271 R. Young; Tr. 460, A. Parks.

44/ Tr. 43, 46. Apparently the FAA has ruled against "controlled air space" over RFP. See also Tr. 280, P. Wehr.

45/ Staff Statement p. 31; Tr. 20 A. Robbins

46/ Tr. 25, A. Robbins, Tr. 223, E. DeChavendes.

47/ Tr. 273-283 P. Wehr

of the facility makes security difficult.^{48/} While the reluctance of the staff to describe security details is understandable, nevertheless it would be useful to amplify the discussion in the FEIS to reflect such information as provided by the staff during the hearings.

10. The treatment of fire hazards and fire safety precautions in the DEIS is considered inadequate by some participants.^{49/} In view of the fire hazards of plutonium and the possibility of fire at the plant, it was their opinion that the DEIS should address this subject in greater detail, including a clarification of the assumptions made as to potential glovebox fire.^{50/}

Perhaps, in discussing the current Plant program on safety - i.e. prevention of fire, accidents, accidental releases, and safety monitoring devices, the DEIS should be amplified along the lines noted by the staff in responding to one participant.^{51/} The staff might also

48/ Tr. 273-284, P. Wehr

49/ Tr. 257, W. Evans; Tr. 404, J. Pekarek

50/ Tr. 257, 404; Staff Statement pp. 23-24.

51/ Tr. 307, J. Matis; Ltr. from H. Roser to J. Matis, June 15, 1978

consider the suggestion^{52/} made for the establishment of a committee to monitor internal plant safety programs to include outside experts from state or local agencies, such as A. J. Hazle, for example.

11. Several participants requested that the authors of the various sections of the DEIS be identified for purposes of completeness and public accountability.^{53/} One suggestion noted is to present detailed scientific and technical material in appendices, with the authorship of those appendices available to the public on request provided it does not impinge on the objectivity of the author. The staff should consider this suggestion for the FEIS. Another participant noted that the public could better review the DEIS if an index were to be included. This suggestion also merits consideration for the FEIS.
12. A significant number of participants requested that the hearings be continued, and that a second opportunity be afforded for public comment during June or July, 1978.^{54/} Their major reasons were: (a) the time period provided

52/ Tr. 27-31, A. Robbins.

53/ Staff Statement, p. 36; Tr. 183-185, J. Cobb

54/ Tr. 23, A. Robbins; Tr. 210 E. DeChavendes; Tr. 273, R. Young
Tr. 496, H. Raiburn; Tr. 313, P. Kiepe; Tr. 188, J. Cobb

by the notice of hearing was too short, and precluded the detailed review necessary, and (b) several other participants who wanted to speak during the May 24-25 hearing dates were unable to do so because of prior commitments elsewhere. Relative to this issue, however, it should be noted that the DEIS was published approximately eight (8) months earlier - in September, 1977. Moreover, as shown during the hearings, some of the subject matter commented on most frequently at the May 24-25 hearings had been the object of serious consideration in 1974, by the "Lamm-Wirth" Rocky Flats Task Force,^{55/} and in 1975, by the Environmental Protection Agency.^{56/} It also became evident at the May 24-25 hearings that much of the testimony offered by participants became more repetitive as the hearings continued.

On the other hand, it should also be noted that the staff has committed itself to undertake two significant actions: a review and recalculation of dose measurements, and an investigation and evaluation of the seismological aspects of the RFP.^{57/} As requested by the representatives of the

^{55/} Tr. 54 R. Herrick-Stare; Tr. 24 A. Robbins; Tr. 189, J. Cobb; Tr. 258-259, D. Evans; Tr. 18 D. Ehrman; Tr. 462 A. Parks

^{56/} "Proceedings of Public Hearings: Plutonium and the Other Trans-uranium Elements." ORP/CSD-75-1 issued by the USEPA - Office of Radiation Programs.

^{57/} It is appropriate that the Board note for the record the cooperation and responsibility displayed by the staff in responding to questions raised by both the Board and the participants.

State of Colorado, it would appear that serious consideration should be given to a reissue of those parts of the DEIS related to these two subjects, with opportunity for public comment limited to such reissued portions.

APPENDIX A

DEIS ERDA 1545-D
Public Hearings
May 24 - 25, 1978

Exhibits and Written Statements submitted at Hearings:

- Ex. #1 (a) "Memorandum of Understanding Between (Tr. 29)
The State of Colorado and The U. S.
Department of Energy", submitted by
Dr. Robbins
- (b) Letter dated Dec. 19, 1977 to (Tr. 30)
Mr. Pennington from Dr. Robbins
- #2 Series of letters and comments (Tr. 77)
submitted by Dr. Carl Johnson,
Director of Health, Jefferson
County Health Dept.
- #3 Document entitled "The Defense (Tr. 161)
Economic Adjustment Act - Planning
For Economic Conversion (S2279-HR
10648)" submitted by Mr. Clifford
Aron of SANE
- #4 Testimony, including appendices, (Tr. 204)
on Rocky Flats Plant DEIS by Dr. John
C. Cobb
- #5 American Friends Service Committee, (Tr. 247)
Ms. DeChavendes for Ms. Judy
Danielson, submitting copies of NRC
documents
- #6 Testimony received from Mr. Steve (Tr. 289)
Davis
- #7 Statement and references of Mr. Paul (Tr. 330)
Kiefe
- #8 Testimony of Mr. B. Hunter as (Tr. 330)
narrated by Dr. Arthur Evans
- #9 Newspaper article and signed peti- (Tr. 415)
tions submitted by Mr. Jim Pekarek

- Ex. #10 (a) Extract of letter from (Tr. 464)
Dr. Edward A. Martell,
National Center for Atmos-
pheric Research, to Environ-
mental Protection Agency
- (b) Copy of letter from Dr. Karl (Tr. 464)
Morgan of the Georgia Institute
of Technology to Dr. Edward A.
Martell
- (c) Copy of letter from Office of (Tr. 464)
Science and Technology Policy,
Executive Office of the President,
to the U.S. Nuclear Regulatory
Commission
- #11 Copy of letter, City of Boulder, to (Tr. 492)
DOE with attached resolution
- #12 Resolution of Arvada City Council (Tr. 86)
- #13 Declaration of the Union of (Tr. 124)
Concerned Scientists - submitted
by Dr. Henry Kendall
- #14 Agenda For Public Hearing, Rocky
Flats Plant - DEIS (1545-D),
May 24-25, 1978
- #15 General Registration List, Public
Hearing, Rocky Flats Plant - DEIS
(1545-D), May 24-25, 1978
- #16 Documents relating to HUD study (Tr. 372)
as to accident potential at Rocky
Flats Plant
- #17 Responses to participants as
forwarded by Mr. E. W. Bean,
Asst. Area Manager for Operations,
DOE, Rocky Flats Area Office,
(index attached)
- #18 Responses to participants, as
forwarded by Mr. H. E. Roser,
Manager, DOE, Albuquerque Operations
Office, (index attached)
- #19 Ltr. 5/26/78 from D. R. Floyd (copy) to
W. Pennington to be included in record
- #20 Ltr. 5/25/78 from M.O'Brien (copy) to
W. Pennington to be included in record

LIST OF RESPONSES MADE TO PARTICIPANTS BY: Earl W. Bean
Asst. Area Mgr.
for Operations
RF Area Office
Golden, Colorado

1. Summary of Dose Calculations
Hearing Participant: Dr. Wrenn
(Hearing Panel Member)
2. Discussion of the Questions and Comments Submitted
by Dr. Carl Johnson - copy of letter to Dr. Johnson
dated June 13, 1978 w/comments
Hearing Participant: Dr. Carl Johnson
3. Copies of References on Air Filtration w/copy ltr. 6/12/78
to Dr. Cobb.
Hearing Participant: Dr. John Cobb
4. Summary of Air Filtration,
Hearing Participant: Dr. Wrenn
(Hearing Panel Member)
w/copy to Dr. John Cobb
5. Wildlife Study by F. W. Whicker, copy ltr. 6/12 to N. Helburn
Hearing Participant: Nicholas Helburn
6. Draft Proposal for Geologic Study of the Golden
Fault, w/copy ltr. 6/12/78 to J.W. Rold, Dir., Col. Geo. Survey
Hearing Participant: Colorado Geological Survey
7. Letter to Mr. Jim Walker answering questions
raised regarding the State's Emergency Plan for
the Rocky Flats Plant
8. Ltr. to J.B. Farmakides from E. Bean enclosing
corrections to Richard G. Cuddihy testimony as
recorded in transcript of hearings 5/24-25/78
9. Letter to Dr. John Cobb dated June 19, 1978
enclosing copies of references requested:
John C. Elder, "Performance of Multiple
HEPA Filters Against Plutonium
Aerosols"
N. A. Fuchs, The Mechanics of Aerosols
S. K. Friedlander, Smoke, Dust and Haze
Richard D. Cadle, The Measurement of Airborne Particles
Note: Our copy of letter did not include enclosures.

APPENDIX A - Ex. #18

LIST OF RESPONSES MADE TO PARTICIPANTS BY Herman J. Roser
Manager
Albuquerque Operations
Office
Albuquerque, N.M.

1. Copy of Memo Bean to Farmakides, 6/7/78 entitled "Responses to Hearing Participants Comments", w/o 6 attachments
2. Discussion of Improvements in Protection From Spills, Fires, Sabotage, Dispersion of Radioactive Contamination and Cost of Relocation Alternatives; copy letter to Mr. Matis from Mr. Roser, 6/15/78
Hearing Participant: John Matis
3. Discussion of "warm particle" theory prepared by Lovelace ITRI, Albuquerque (TR. p. 364) which is being transmitted to Edward Martell
4. Copy letter to Anthony Roisman 6/26/78 re Presidential directive and Congressional legislation re DOE's authority to produce nuclear weapons.
5. Copy of letter to Dr. Edward A. Martell enclosing paper on "warm particle" theory prepared by Lovelace Inhalation Toxicology Research Institute, Albuquerque, N.M. (We did not get copy of enclosure)
6. Letter 6/20/78 to J.B.Farmakides from Fritz Cohen, Military Audit Project re DOE's compliance w/PL 94-141; J. Farmakides' letter to H.Roser 6/22/78; J. Farmakides' response to Ms. Cohen 6/22/78; H. Roser's response to Ms. Cohen 6/23/78.

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