

Rocky Flats Citizens Advisory Board Recommendation 2001-1

to the U.S. Department of Energy

Application of the ALARA Principle
to Soil Remediation at Rocky Flats

Approved May 17, 2001

RFCAB understands that the ALARA ("as low as reasonably achievable") principle is a key component of the soil-remediation framework proposed by the Agencies in their report entitled *Radionuclide Soil Action Level Regulatory Analysis*. On page 12 of that report, it is stated:

"In accordance with the decommissioning rule, an ALARA analysis will be performed for each cleanup project.... DOE will develop a detailed protocol for how these analyses will be conducted, in consultation with CDPHE, EPA, Local Communities and the Public, which will outline factors to be considered and how those factors will be weighed in the final analysis."

There is a great deal of ambiguity surrounding ALARA. At public meetings, the community has repeatedly been told that ALARA will be a driving factor toward cleanup beyond the RSALs. Yet, without a clearer understanding of what ALARA analysis entails, we are left to wonder how greater cleanup will actually be accomplished. This lack of detail on ALARA may become especially significant once the Agencies complete the RSAL Review. In order to judge the protectiveness of the overall cleanup framework being proposed by the Agencies, stakeholders must be able to evaluate the Agencies' ALARA methodology simultaneously with the RSALs.

Therefore, RFCAB recommends the following:

- The Agencies should develop a detailed ALARA proposal and detailed protocol prior to completion of the RSAL Review.
- The proposal needs to be explicit as to the scope of ALARA application. For instance, is ALARA to be applied only at sites where contamination exceeds the RSAL, or more broadly?
- The Agencies should explain how the ALARA decision-making process would differ among various cleanup projects.
- It is vitally important that the community be fully engaged in the process of defining ALARA.

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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