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# Rocky Flats Citizens Advisory Board

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## A Vision for the Cleanup of Rocky Flats

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### Introduction

The following pages present the Rocky Flats Citizens Advisory Board's "Vision" for the cleanup and closure of the Rocky Flats site. This paper presents not only the Board's actual Vision, but also information about the motivation for and the process used by the Board in developing its Vision. One year in the making, this Vision represents a major activity of the Board during the latter part of 1998 and a majority of 1999. As explained below, the Board hopes that this Vision will serve as a contextual framework as it reviews and provides future recommendations on the many plans and documents that will detail the cleanup and closure of Rocky Flats.

When the Rocky Flats Citizens Advisory Board (RFCAB) was formed in 1993, the Rocky Flats mission had changed from production to cleanup, yet no clear plans had been developed. A large quantity of material was still being stored in unsafe conditions, and was therefore a priority for site officials. In terms of cleanup, a number of ideas were being developed for what to do with buildings, environmental contamination, hazardous and radioactive wastes and other nuclear materials being stored onsite. Various alternatives were being floated about by site planners, such as "mothballing" buildings, filling buildings with concrete, building a new plutonium storage vault, disposing of low level waste onsite, and reusing certain Rocky Flats buildings. In 1995, the Department of Energy released its Baseline Environmental Management Report (BEMR). BEMR was an attempt to quantify the cleanup pricetag and schedule for the DOE's Environmental Management sites, such as Rocky Flats. BEMR estimated that cleaning up Rocky Flats would cost \$23 billion and take 75 years.

During the next few years, plans to clean up Rocky Flats

began to come together. The present contractor, Kaiser-Hill, took over as the Integrating Management Contractor for the site in the summer of 1995. One of the company's first actions was to develop the Accelerated Site Action Project, or ASAP. This was the first plan to conceive of accomplishing cleanup on a faster schedule. ASAP was followed by several iterations of plans, which culminated in a national focus on accelerated cleanup - the Ten Year Plan. Also during this time, DOE and its regulatory agencies signed the Rocky Flats Cleanup Agreement

(RFCA). RFCA's preamble laid out the same assumptions that had evolved into the Ten Year Plan concept. As these pieces were coming together, RFCAB continued to provide a number of recommendations on a wide variety of cleanup issues. By 1998, the Board had made more than 70 recommendations. These recommendations addressed waste management, future use, plutonium storage and many other individual issues as they came up.

During 1998, it became apparent to the Board that the specific cleanup strategies in what was now being called Accelerating Cleanup: Paths to Closure had remained fairly stable for a couple of years. After years of repeated alterations to the cleanup approach, DOE and Kaiser-Hill had seemingly identified a desired strategy. Instead of continuing to address cleanup issues in a piecemeal manner, the Board decided it was time to take an overall look at the Rocky Flats closure plan and make some judgments.

In October 1998, the Board finalized a work plan for 1999 that was very different from previous work plans. Instead of identifying a number of issues and assigning them to committees to work on throughout the year, this work plan disbanded committees, and called for two Board meetings a month to address the major questions associated with the Rocky Flats closure plan.

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### The Framework

In developing its 1999 work plan, the Board developed a list of questions regarding various elements of the closure plan:

#### Waste Management

- Should all waste materials be expeditiously removed from Rocky Flats?
- What should be done with clean building rubble from D&D?
- As stated in previous recommendations, does the Board still oppose all on-site disposal?
- If the Board supports off-site disposal, are the planned disposal sites acceptable for different types of waste?
- WIPP, Nevada Test Site, Envirocare, Deer Trail: Does the Board support movement of materials to these sites?
- What are CAB's waste transportation concerns?
- If off-site options are not available, what should be the contingency plan for the different types of waste?

#### Environmental Restoration

- Does the Board support RFCA Soil Action Levels? Or some other level?
- Does the Board support the reuse assumptions guiding the cleanup levels (open space for buffer zone and industrial for industrial area)?
- Should background levels still be the ultimate goal?
- What strategy should RFETS use to avoid future surface water contaminant release exceedances?

#### Decontamination and Decommissioning

- Does the Board support leaving building foundations in place?
- Would the Board support the placement of long-term engineered caps over certain contaminated areas?
- Does the Board support the site's D&D strategy? (prioritization / sequencing) ?
- Does the Board still support removal of all buildings?
- Does the Board have any concerns relating to D&D techniques of the buildings?

### **Special Nuclear Materials**

- Should all SNM be expeditiously removed from Rocky Flats?
- Does the Board support DOE's plans to ship SNM to Pantex and Savannah River? Or should other options be considered?
- Does the Board support DOE's plans for plutonium residues (i.e. disposal at WIPP, etc)?

### **Reuse Designation**

- Does the Board still support the concept of using the entire site as open space after closure?
- Would any other uses be acceptable?

### **Stewardship / Natural Resources Management**

- How does the Board want to be involved in future stewardship discussions?
- What should be done to manage the natural resources at Rocky Flats during and after cleanup?

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## A Vision for the Cleanup of Rocky Flats

### The Vision

As previously described, the Board considered various elements of its vision for the cleanup and closure of the Rocky Flats site during late 1998 and 1999. Since its inception in 1993, the Board had already developed recommendations and comments on many of the vision areas. The material presented below is an up-to-date representation of the Board's vision through recently- developed recommendations and statements, as well as through reaffirmation of those developed in the past.

[Waste Management](#) | [Environmental Restoration](#) |  
[Decontamination and Decommissioning](#) |  
[Special Nuclear Materials](#) | [Site Reuse](#) | [Stewardship](#)

### Waste Management

As originally stated in RFCAB Recommendation 95-14, the Board continues to oppose any radioactive waste disposal onsite. There is no consensus within the Board on whether or not it supports disposing of transuranic waste at the Waste Isolation Pilot Plant.

Although the Board did not reach agreement on management options for Rocky Flats low level waste, it did develop the following containment criteria to guide DOE in its low level waste management planning. These criteria can be applied regardless of the disposition location. RFCAB offers the following criteria for use by the Department of Energy and other appropriate groups to screen potential low level waste management options.

The Board believes that the words "storage" and "disposal" may not be sufficiently defined to characterize its desired waste management strategies. Our members have agreed that the word "containment" is a better choice to describe the type of management we feel is necessary for this type of material. RFCAB's definition of containment is: "control of low level waste so that it is isolated from humans and the environment."

Because of potential technical, political and societal changes that may impact the safe storage of these wastes at some point in the future, the Board does not believe that any current waste storage strategies can be viewed as permanent solutions. As such, low level waste containment systems shall be designed for replacement, refurbishment, or upgrade at intervals no longer than approximately 200 years. In addition, RFCAB urges DOE to continue to develop better and safer waste

management technologies. Therefore, DOE (or its successors) must commit to periodically (i.e., every 5 years) assess whether it can improve either the treatment or the containment of the waste.

Low level waste must be contained in a manner that is:

**Isolated:** Low level waste will be isolated geographically from humans, and, through use of containment technologies, from the environment.

**Monitored:** Any breach of containment will be detected through an active program of monitoring in time to ensure that the low level waste remains isolated from the environment.

**Retrievable:** The low level waste containment system will be designed and operated so that the waste shall be managed and/or removed in the event of loss of isolation. If new technologies become available for waste treatment, their application should be considered based on an analysis by future decision-makers and stakeholders.

**Secure:**

1. The containment system will be sufficiently protected so that waste is not accessible to those wishing to cause harm.

2. The containment system will be sufficiently marked / identified so that future generations will not encounter or release contaminants inadvertently.

***Additional Considerations***

**Stewardship:**

1. Funding to ensure long-term effectiveness of the containment system shall be provided for throughout the life of the containment system.

2. Communities shall participate in decisions about and management of the containment system.

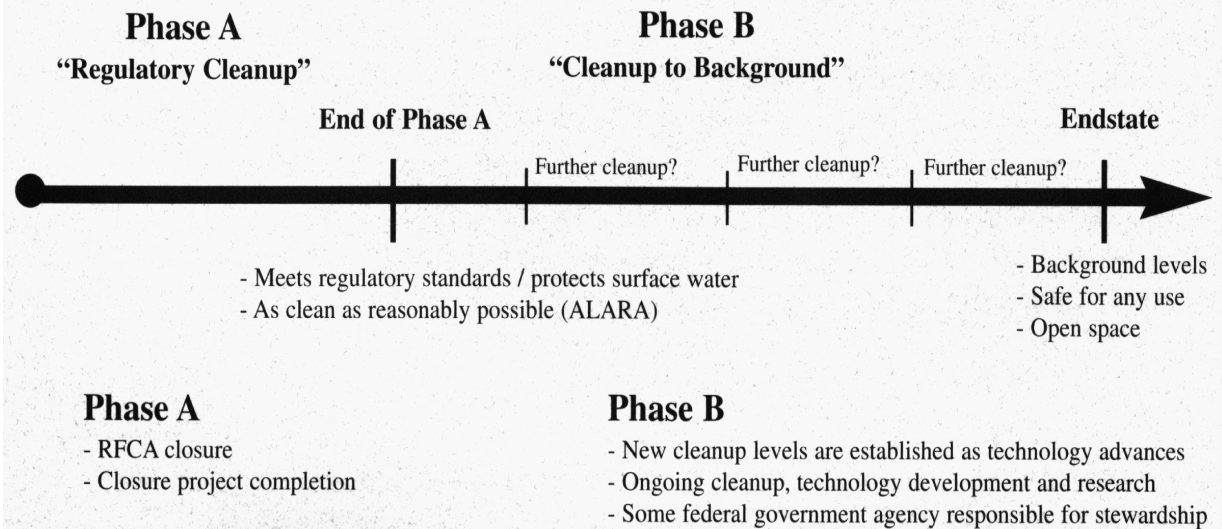
**Transportation:**

The Board believes that the risks involved in transportation must be considered as an inseparable part of the overall analysis when considering options for waste containment systems.

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## **Environmental Restoration**

The Board envisions a two-phased cleanup for Rocky Flats. As can be seen on the following diagram, the first phase would encompass the regulatory cleanup requirements combined with an ALARA analysis. The second phase would be marked by continued technology development and cleanup as it becomes feasible.



**At the End of the Regulatory Cleanup.** With public involvement, the RFCA parties should specify a cleanup level for the end of the regulatory cleanup phase that will be protective of both human health and surface water quality. Also, the site must perform an ALARA analysis to determine if further cleanup (i.e., levels approaching background) can be accomplished with a net benefit to the public and the environment. The Board defines background as the mean value of background measurements for the Colorado Front Range including naturally-occurring and fallout radiation.

#### **During the Cleanup to Background Phase.**

- The site steward, either the owner or those providing maintenance and monitoring onsite, will monitor and participate in the development of cleanup technologies. As new technologies are developed and demonstrated, the steward will perform an ALARA analysis to determine if the new cleanup technology, if deployed at the site, will result in a net benefit to the public and the environment.
- Some public entity will be formed or maintained to provide input into technology use decisions and technology development goals.
- Some method will be chosen to ensure that funding is available for continued cleanup and technology development for application at RFETS.

**Caps:** Based on initial discussions about the potential use of caps in areas with residual contamination, a majority of the Board generally opposes the use of caps unless they are shown to be the only option available as a temporary measure to stop the spread of contamination. The Board will continue to discuss this issue as cleanup plans are further refined.

**General Cleanup Principles:** In 1996, the Board developed a set of cleanup principles that it continues to support. They are summarized as follows:

- **Health and Safety During Cleanup.** Safety management must be implemented and incorporated throughout cleanup and restoration activities. Retention of the trained workforce is a key element.
- **Waste Generation.** Cleanup should generate no more waste than is

necessary to meet goals. However, waste minimization is not a justification for lesser amounts of cleanup.

- **No Further Degradation of the Environment.** Protecting natural resources is a priority in selecting cleanup alternatives — including ecological, geological, hydrological and air resources. Alternatives should be designed to prevent cross-contamination. Cleanup operations should not contaminate new areas or areas previously cleaned up.
- **Technology Utilization.** Match the inventory of cleanup needs to current technology to determine where it may be utilized. Identify areas where a new, emerging technology may be more cost effective or efficient.
- **Background Levels.** The long-term goal for cleanup is to achieve a level of residual contamination equal to or less than average background of radiation. Near-term standards need to be protective of human health and the environment. Periodically compare cleanup level goals to available technology to determine if the levels can be made more protective.
- **Risk Levels / Land Use.** Residual contamination and health risks should be compatible with future site use.
- **Budgetary Considerations.** Budgetary constraints should never affect the actual level of risk reduction.
- **Institutional Controls / Risk Elimination.** All areas designated "restricted use" should require an institutional control program, which provides for proper monitoring, testing and contingency plans in the event of a contaminant release. Management of "restricted use" areas should continue indefinitely, or until reclassified as "unrestricted use."
- **Timing of Decisions.** Rocky Flats cleanup activities must be completed before future land use planning is finalized.

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## Decontamination and Decommissioning

In 1998, the Board recommended that all buildings at Rocky Flats be demolished or otherwise removed from the site. The Board has reaffirmed this position during its vision development process.

The Department of Energy and Kaiser-Hill developed a Deactivation and Decommissioning Strategy document to detail the prioritization and sequencing of D&D activities. The strategy states that prioritization will be based on the extent at which removal of each building will support risk reduction, accelerate the critical path, maximize the rate of mortgage reduction, and optimize the utilization of resources. The Board supports the strategy and sequencing of building D&D granted that necessary margins of safety are provided for worker, public, and environmental health and safety.

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## Special Nuclear Materials

RFCAB continues to endorse its previous recommendations, which state that all special nuclear materials should be removed from the site. In 1995, the Board developed a set of core values and beliefs associated with plutonium at Rocky Flats.

- Plutonium must be in the safest storage possible.
- Plutonium must be removed at the earliest possible date.
- Actions involving plutonium must be designed to minimize handling to provide as low as reasonably achievable exposure to workers.
- Near-term actions must be in concert with disposition and be consistent with

## United States non-proliferation goals.

In 1996, the Board offered several considerations for disposition of excess plutonium:

**General.** DOE should reduce the transport of fissile materials to a minimum, and reduce the current and future risk of nuclear proliferation. All activities must be subject to external, independent regulation. Any option selected by DOE must protect the health and safety of the public and workers, assure the integrity of the environment, and protect future generations.

**Processing and Storage.** Reduce or eliminate the need for future processing or handling, either at Rocky Flats or another site. Processing should put the plutonium in a form suitable for disposition. Immobilization of plutonium appears to be the best option for storage. DOE should consider vitrification and ceramification as the preferred options; small-scale pilot plants at various sites could help prove the technology. In all options, the goal should be to make the plutonium as proliferation-resistant as possible.

**Criteria for Selecting Disposition Site.** DOE should first ensure that there is broad support in the local community for any new facilities and that the new mission fits with whatever current mission exists at the chosen site. Then, DOE must pledge to mitigate intersite equity issues; ensure that adverse economic, social, environmental and worker health and safety impacts are minimized; and that new areas of contamination are also minimized.

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### Site Reuse

RFCAB continues to support preserving the entire Rocky Flats site as open space upon completion of cleanup (originally stated in RFCAB Recommendation 98-13). RFCAB supports DOE's plans to demolish all buildings onsite. It also believes that no new development or redevelopment should take place anywhere on the Rocky Flats site. The Board is concerned that the additional disturbance of soils could potentially release contamination into neighboring communities. Unique ecological assets could also be further disturbed due to new construction. The specific type of open space should be determined in the future when final site conditions are better defined.

RFCAB also recommends that the agencies initiate a comprehensive public involvement campaign to determine the public's vision of the Rocky Flats site end-state, before a specified type of open space is determined. Long-term stewardship, final cleanup levels, actinide migration, and the presence/absence of caps are several issues that require clarification and public participation.

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### Stewardship

Although RFCAB intended for stewardship to be a part of this Vision, conversations for an extended stewardship dialogue were just beginning as RFCAB developed this document. Therefore, the Board will refrain from making any specific stewardship recommendations until this process has been completed.

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### The Closure Plan Assumptions

One of the Board's first activities in developing its Vision was to review the current closure plan for Rocky Flats. This closure plan consists of several key strategies. It is currently based on a 2010 completion date, but Kaiser-Hill has recently submitted a proposed 2006 baseline plan to DOE for review. Under each plan, however, the proposed end-state of the site is the same:

- All nuclear waste and materials will be shipped offsite for disposal.
- All buildings onsite will be decontaminated if necessary and demolished.
- RFCA Soil Action Levels will be met so that the buffer zone is safe for use as open space and the industrial area is safe for either open space or industrial uses.
- Certain areas within the industrial area may have engineered closure caps installed to prevent the spread of residual contamination.
- Surface water leaving the site will be safe for any and all uses.
- Long-term monitoring and institutional controls will be in place.
- The site's budget will be approximately \$50 million per year and there will be fewer than 100 employees

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### The Process

Following is an outline of the discussions that took place at each monthly work session or study session throughout the development of the Board's "Vision."

#### October 1998

The first topic the Board decided to discuss is how each Board member viewed the concept of "cleanup" and "closure," and more specifically their definitions of those terms. DOE-Rocky Flats representatives gave a presentation to the Board on the site's perspective — what the Closure Project means to them — including the assumptions made in planning for the closure of Rocky Flats. The initial discussion simply allowed the Board members a chance to air their views, an opportunity for each to see what the varying points of view would be. Some of the themes from the first discussion included:

- Ultimately the cleanup should be done to background levels.
- Interim cleanup levels should be used.
- Closure might be when DOE completes the project, but cleanup may still be necessary after that.
- Use a phased approach.

#### November 1998

As a follow-up to the October meetings, comments were reviewed and any areas of divergence and/or convergence on specific topics were identified. RFCAB members' opinions varied on how the terms should be used — cleanup vs. closure — since at times both terms are used interchangeably. In addition, Board members' views of what

exactly needed to be accomplished by the time of closure, be it 2006 or 2010, varied significantly. However, members did seem to generally agree that DOE's end-state, as described in the closure plan, did not necessarily mean that action at the Rocky Flats site would end. RFCAB members would need to include a discussion in the future about post-closure and stewardship issues.

Next, Board members worked through their thoughts on specific areas involving cleanup and closure, such as environmental restoration, waste management, D&D, disposition of special nuclear materials, and stewardship. Working backward from the end-state, the Board tentatively agreed to a timeline showing the end-state as "cleanup to background levels, safe for any use, and reuse designated as open space." A second phase of cleanup — Phase B — would involve new or interim cleanup levels, ongoing cleanup, technology development and research, with a federal agency responsible for stewardship. The current phase of cleanup was left somewhat open, with more specific definitions to be provided in a future discussion.

Also in November, the Board received a general presentation on waste storage issues. This would comprise the next topic RFCAB would engage in for a few months. The presentation gave general information about the current inventory at the site, plans for the future, etc. Then Board members began an open discussion about waste. Ideas and comments generated:

- Should there be new buildings for waste storage, whether permanent or temporary? What about the possibility of using buildings already in place?
- What about building foundations, rubble, and process lines that need to be removed?
- Does RFCAB support the shipment of waste offsite? And if so, where to?
- Closure will not be possible if the waste remains onsite.

## **December 1998**

The Board agreed by consensus on a revised timeline for phases of cleanup at the site, as originally agreed to at its November meetings:

Phase A: cleanup to regulatory levels  
Phase B: cleanup to background levels

Next, as a follow-up to its initial waste storage/disposition discussion, the Board launched into discussion and debate about whether or not waste from Rocky Flats should be sent to the WIPP site, as well as other issues about the long-term storage and disposition of waste. Although many Board members are in favor of shipping waste to WIPP, an equal number are opposed and have concerns about transportation, monitoring, and access to the waste after it is stored. Based on the comments and concerns raised by RFCAB members, there appeared to be two distinct areas on which the Board could agree:

- Research should continue into technologies that would make radioactive waste less dangerous, or inert, in the future.
- Waste should be stored or disposed in a manner that poses the least risk to humans and the environment.

However, opinions varied so widely on fundamental issues surrounding the ultimate disposition of waste that the Board could not reach consensus on this issue.

### **January 1999**

RFCAB had other projects to work on during the month of January, and did not schedule any substantial discussions on Vision topics. However, staff did present a matrix/timeline for the remainder of topics to be covered for the Vision process and a draft outline on how this Vision document might be prepared.

### **February 1999**

This month, Board members began discussing a new topic, what to do with building rubble resulting from demolition. DOE gave a presentation to RFCAB on the site's plans. Three options were presented, with a preferred option being to fill the foundations of two buildings — 371 and 771 — with the clean rubble generated at the site. Areas of convergence that were identified so far:

- General support for the onsite disposition of clean building rubble.
- Complete characterization and remediation of under-building contamination before filling the foundations.

### **March 1999**

To start the discussions on low level waste issues, RFCAB received a presentation from the site on its inventories of low level and low level mixed waste, as well as plans for disposition. Waste may be shipped to either the Nevada Test Site, Envirocare in Utah, and possibly Hanford. The Deer Trail facility on the eastern plains of Colorado was being considered as a site to accept waste with concentrations greater than 10 nCi/g, yet less than 100 nCi/g, or "orphan" wastes. However, this option was later removed from consideration by the company that owns the site. Board members asked for more detailed information to aid in their discussions: information about disposal criteria, regulations, long-term stewardship of the waste, surveillance and monitoring plans, transportation of the waste, contingencies, and possible alternatives.

The Board also continued working on draft comments to DOE about its position on the disposition of building rubble.

### **April 1999**

RFCAB members discussed the process for developing its Vision, and decided to change its process for continuing the discussions a little bit — allowing a less-structured format during discussions, and using email for early discussions prior to the meetings, to help get comments out in the open.

The Board finalized a letter to be sent to DOE stating RFCAB comments on the site's plan for disposition of building rubble. As there was not clear consensus of opinions, Board members agreed simply to send a letter transmitting their comments:

- Adequate remediation of under-building contamination is required, also use adequate sampling protocols and techniques.
- Ensure no impacts from dust off the staged rubble, or impacts on surface water quality from building rubble

runoff.

- Monitoring the disposition area must continue; make the rubble retrievable; include building rubble location in plans and materials.
- Consider using a Corrective Action Management Unit (CAMU) as an option.

Also in April, RFCAB continued with a follow-up discussion on low level waste issues. Members began to outline concerns about the disposition of low level mixed waste — including remediation and treatment as an alternative to disposal, defining the difference between "storage" and "disposal," maintaining the waste in a monitored and retrievable configuration; and transportation risks. Board members then agreed to discuss their ideas and concerns via email.

### **May 1999**

Based on its email discussions held between meetings, Board members had an idea of each other's concerns and points of view about low level waste disposition. In May they worked on analyzing and developing an agreement on what is more appropriate: storage vs. disposal, onsite vs. offsite. The Board agreed to use the term "containment," then created a list of values they shared about containment of low level waste - that it be isolated, monitored, retrievable, and secure.

Next, members worked on assessing a set of low level waste storage and disposal options, but were unable to reach agreement on any of the options they had suggested. They could, however, agree on a few themes that came out of their discussions:

- The containment system should be designed for shorter periods of time, no longer than 200 years.
- A secondary containment system should also be designed in the event of failure.
- Transportation risks must be considered.

### **June 1999**

Once again via email, Board members had the opportunity to review and comment on a draft Vision recommendation on Low Level Waste Containment prior to meeting in June. At

that meeting, they worked on refining the Vision statement, by adding language that better defined each of its values — that the waste be isolated, monitored, retrievable, and secure — and adding statements about stewardship, future funding, and public involvement.

Also in June, the staff gave Board members an update on their progress toward developing the Vision, what needed to be accomplished and in what timeframe so as to complete the process, and issues that still needed to be addressed.

### **July 1999**

Following up on an initial discussion of cleanup levels and cleanup phases, originally began in December, the Board now felt it had discussed enough of its Vision concept to again address the issue of cleanup levels. Staff prepared a list of possible options for RFCAB members to consider their view of cleanup levels during regulatory cleanup, and also for a period of time after regulatory cleanup had finished. Board members agreed on a statement that at the end of regulatory cleanup, the level should meet unrestricted use criteria and protect surface water quality. Comments were added to ensure that new cleanup technologies be analyzed and considered into the future.

Then in the study session, RFCAB received a presentation on the proposed use of closure caps at the site. After giving each member a chance to present their views on this environmental restoration option, the Board agreed in general it did not support the use of caps, unless there is no other option available.

### **August 1999**

The Board refined its definition of background levels for radiation in soils.

### **September - October 1999**

The Board identified some areas that needed clarification in September and officially approved the final document in October.

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### Vision Elements at a Glance:

#### Environmental Restoration

The Board maintains an ultimate goal of cleaning up the site to background levels for plutonium. The interim cleanup goal should be one that is protective of human health and surface water quality. Also, the site should perform an ALARA analysis to determine if further cleanup (i.e., levels approaching average Colorado Front Range background levels) can be accomplished with a net benefit to the public and the environment. In initial discussions, a majority of the Board generally opposes the use of caps unless they are shown to be the only option available as a temporary measure to stop the spread of contamination. The Board will continue to discuss this issue.

#### Building D&D

The Board supports the demolition of all buildings at the site.

#### Special Nuclear Materials

The Board supports the movement of plutonium and other nuclear materials to safe offsite facilities.

#### Waste Management

The Board continues to oppose any radioactive waste disposal onsite. There is no consensus within the Board on whether or not it would support disposing of transuranic waste at the Waste Isolation Pilot Plant.

Although the Board did not reach agreement on management options for Rocky Flats low level waste, it did develop containment criteria to guide DOE in its low level waste management planning. Any low level waste facility should be isolated, monitored, retrievable and secure. Long-term funding must be addressed. The public should be

involved in decisions about the facility. Finally, the risks involved in transportation of wastes need to be included in the analysis of waste management options.

### **Site Reuse**

The Board recommends that the entire site become open space after the completion of interim cleanup. No new development or redevelopment should be allowed on the Rocky Flats site before or after closure.

### **Stewardship**

The Board's recommendations on stewardship will coincide with a community dialogue process currently under development.

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