

# Rocky Flats Coalition of Local Governments

Boulder County      City and County of Broomfield      Jefferson County  
City of Arvada      City of Boulder      City of Westminster      Town of Superior

8461 Turnpike Drive, Suite 205  
Westminster, CO 80031

(303) 412-1200  
(303) 412-1211 (f)  
[www.rfclog.org](http://www.rfclog.org)

July 15, 2003

Ms. Dyan Foss  
Kaiser-Hill, L.L.C.  
Rocky Flats Environmental Technology Site  
10808 Highway 93, Unit B, T124A  
Golden, CO 80403-8200

Dear Ms. Foss:

On behalf of the Board of Directors of the Rocky Flats Coalition of Local Governments, I am submitting the following comments on the *771 Closure Project Decommissioning Operations Plan Modification 5* (DOP Modification). The Coalition appreciates the opportunity to provide feedback on this proposed change in the decontamination strategy for building 771 (B771) and building 774 (B774), and we look forward to receiving your written reply.

This proposal to decontaminate the B771/774 deep basements to the radionuclide action levels represents a significant departure from the earlier plan to decontaminate the entirety of both buildings to the free release standard. The Coalition Board appreciates the numerous briefings the Site has given to the Coalition staff and Board in the past few months to explain this proposed decontamination strategy.

It is clear from reading this version of the DOP Modification that the concerns and questions raised with Kaiser-Hill and DOE during the prior briefings and in the June 6, 2003 Coalition staff memo were carefully considered. We appreciate the extent to which the Board's questions were addressed in the document, most notably with regards to worker and environmental risk, groundwater control in the area, seep formation, erosion potential, land configuration, and long-term stewardship.

As Dave Shelton noted at the June Board meeting, the remediation of B771/774 is interlinked with a number of issues, including groundwater movement and contamination, erosion potential, hill slope stability, final land configuration, and proximity to B371 and B776/777. We appreciate the consideration of these interrelated issues in the DOP modification.

The Coalition Board recognizes that the short period of time available to discuss this proposal is a direct result of the accelerated demolition schedule. However, we understand that much work remains to be done on the interrelated issues raised by Dave Shelton. Until we see the results of

this work (such as the groundwater modeling and land configuration design), the Board is withholding judgment on the proposal to not free-release the deep basements. We do believe we have a better understanding of the proposal and related issues based on conversations between the Site and Coalition staff. We trust that we will continue to have an open dialogue with the Site as the B771 decontamination and demolition project proceeds, and that we will gain a better sense of how this remediation project fits in with the remediation of the northern Industrial Area as a whole. As you proceed with the B771 remediation planning, we request clarification on the following issues with DOP Modification.

### **Long-Term Stewardship**

Stewardship is of great importance to the Coalition and must be integrated with remedy selection decisions to ensure the long-term protection and viability of selected remedies. We appreciate the incorporation of near-term and long-term stewardship considerations in Section 4.7.4 (Project Cleanup, Demobilization, and Post-Demolition) of the DOP Modification. This section of the document is a valuable addition to the DOP, as it provides a good overview of the near-term controls, long-term institutional controls, and post-remediation inspections that may be necessary to protect the remedy.

The Coalition understands that footer and French drains will likely be used to route groundwater away from the basement post-closure. These drains were not mentioned in the long-term stewardship section of the DOP, though we know that such a system will require periodic inspections and eventual maintenance, among other actions. Please include the stewardship requirements for these drains in this document.

### **Tunnels**

We understand from prior conversations that Kaiser-Hill is planning to apply lessons learned from the B991 tunnel disposition to help decide the fate of the B771 tunnels, which could be removed, filled with flowable material, or left in place. The Coalition would like to see the results of the B991 and B771 tunnel analyses before we can offer an opinion as to the fate of the tunnels. We are concerned, however, about the possibility of leaving the tunnels in place. If the tunnels are not at least filled, it seems there is high potential for the tunnels to serve as a preferential pathway for groundwater movement, which could generate seeps or route groundwater flow away from the proposed groundwater treatment unit. Also, the tunnels could collapse, which could result in sloughing or formation of a hazardous trough. We request that Kaiser-Hill consult with the Coalition when determining the fate of the B771 tunnels.

### **Independent Verification**

During the B776 DOP Modification process, the communities and regulators expressed concern that Kaiser-Hill was reconsidering their commitment to perform independent verification (IV) for B776. Based on these concerns, Kaiser-Hill agreed to perform IV of the B776 characterization results. Section 4.6 (Pre-Demolition Survey) of the B771 DOP Modification states that an IV survey *may* be performed on B771. The Coalition believes IV should be performed for B771 as well. Our support is rooted in the understanding that IV confirms which portions of the building meet the free release criteria and also helps define areas of residual contamination, information that is vital in determining post-closure stewardship requirements.

## **Air Monitoring**

The Coalition has consistently supported the use of project-specific air monitoring to determine the air impacts of demolition projects. The DOP Modification includes general language such as "... environmental monitoring systems will be used, including Site-wide and project-specific air ... monitoring systems as described in the ... Integrated Monitoring Plan", found in the Executive Summary, and also "Activities conducted during facility demolition will also be monitored on a continual basis ...", found in Section 8.2 (Air Quality). While we understand that the details of the B771-specific air monitoring program will be captured in the IMP, the annual IMP review to address project-specific air monitoring is not yet scheduled. Therefore, we request that more detail on the B771 air monitoring requirements be included in the DOP Modification to provide guidance for the IMP process.

## **Figures**

The text in Section 4.7.1.8 (Demolition of the Main Building 771 Structure) describes the planned three-sided configuration for the Building 771 foundation area after demolition, and states that "Figures 4 and 5 provide an aerial view of this concept." Figures 4 and 5 provide a useful aerial view, but they do not show the three-sided configuration referenced. During the Coalition staff briefings, Site representatives distributed side-view diagrams of the post-demolition condition of B771 and B774. It would be helpful to include these diagrams so that the reader has a better understanding of the depth of the buildings and how much of the structures will be demolished.

Thank you for the opportunity to comment on this document and for your continuing commitment to work with the Coalition on the safe and timely closure of Rocky Flats. If you have any questions about the Coalition's comments, please call me at (303) 412-1200.

Sincerely,

/s/

David M. Abelson  
Executive Director

cc: Rick Di Salvo, DOE  
Joe Legare, DOE  
Steve Gunderson, CDPHE  
Tim Rehder, EPA  
Dave Shelton, Kaiser-Hill  
Jeremy Karpatkin, DOE  
Bob Davis, Kaiser-Hill  
Chris Gilbreath, Kaiser-Hill  
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