

Rocky Flats Coalition of Local Governments

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February 26, 2001

Ms. Dyan Foss
Kaiser-Hill Company
Rocky Flats Environmental Technology Site
10808 Highway 93, Unit B, Building 130
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 *Building 371/374 Closure Project Decommissioning Operations Plan*. Please note that many of the issues we raise below apply not only to the Building 371 Closure Project, but also to the Decontamination and Decommissioning (D&D) and Environmental Restoration (ER) of the entire Industrial Area (IA).

In addition to this letter, two Coalition governments have raised issues and forwarded comments. We request these comments be appropriately considered and addressed before the final document is issued.

Future Modifications to the DOP

The Coalition understands that Building 371 will not be demolished until 2005. The lack of detail in this document points out a need to revisit the 371 DOP at some time in the future in order to incorporate new information and lessons learned from the deconstruction of other major plutonium buildings that will occur prior to the 371 demolition. It is thus imperative that the process for modifying the DOP be clearly stated in this DOP and other relevant D&D decision documents. Towards this end, the discussion found on page 17 for incorporating "significant changes" should be expanded to more clearly explain the process the RFCA parties will follow to address such changes. In addition, the 371 DOP should be expanded to:

- o Define "significant changes";
- o Describe how local governments and other stakeholders can provide input on any proposed changes;

- Explain the process for resolving disagreements among the RFCA parties as to whether a change should require a modification to the DOP; and
- Include a reference to the RFCA section that concerns DOP modifications.

Integration of D&D and ER Activities

According to the *Industrial Area Characterization and Remediation Strategy*, a central component of the Site's IA remediation strategy is the integration of D&D and ER during project planning. While this integrative approach can benefit closure, at this point in the project schedule there remains a significant amount of uncertainty regarding some key D&D and ER issues. Examples include the IA characterization results, soil action levels, the Site's water balance study results, and future decision document requirements.

Along these lines, the 371 DOP does not sufficiently explain the process for integrating D&D and ER activities. Thus additional work might be required after the 371 project is completed to meet potential requirements for achieving the final site condition. To avoid that risk and the resulting increases in cost and work scope, the Coalition requests the following sections be expanded:

- Alternatives Analysis and Selection;
- Facility Demolition (especially Demolition of the Main Portion of Building 371); and
- Environmental Consequences (in particular the NEPA review process).

ER Activities

The Coalition has expressed concern about the plan to remove only the 771 UBC that exceeds current Tier I action levels. In our 771 letter, we also stated we have not agreed it is the best alternative to leave foundations in place after closure. On page 46 of the 371 DOP, there are references to performing ER activities before the building is taken down and to leaving portions of the building in the subsurface. To better evaluate these proposals, we request additional information on this portion of the project, and request that these issues be more completely addressed in the DOP. Specifically,

- What ER activities are planned for the 371 UBC and the process lines under the building footprint?
- If that is unknown at this time, when will the necessary characterization take place?
- If UBC is found under the building, which decision document will contain the remediation strategy? The 371 DOP? An ER document?
- Will this DOP be changed in the future to include descriptions this ER work and how it fits in with the overall project plan?

Stewardship

The Coalition supports the safe and effective cleanup and closure of Rocky Flats and we emphasize that the remedies selected for the Site should reflect long-term stewardship needs and obligations. This approach to remedy selection is necessary as the current IA remediation strategy and recent DOPs call for leaving materials, such as building footings and foundations and hazardous and/or radioactive contaminants, in place at the completion of closure projects. We request that the Site incorporate stewardship into remedy selection by, as a first step, including a stewardship analysis in this DOP.

Use of Explosives

The Coalition shares the Site's goal of conducting the 371 Closure Project in the safest, most effective manner. An issue of concern to many Board members is the use of explosives during demolition at Rocky Flats, so we appreciate the Site's commitment to the rigorous consultative process that is outlined in the *RSOP for Facility Disposition* and the 371 DOP. Just as the Coalition stated in its letter on the 771 DOP, we would like additional information to evaluate the decision to use explosives to demolish portions of Building 371.

More specifically, Section 4.5.6 of the 371 DOP outlines the general plan for demolishing the main portion of Building 371. We understand that 371 was designed to be much more rugged than other Site buildings and that demolishing it will be a difficult task. The Coalition therefore requests this portion of the document be expanded to better document the use of explosives. Likewise, as additional information is generated, we encourage the Site to share this information with all interested parties.

Air Monitoring

In the Coalition's 771 letter, we requested that project-specific air monitoring be performed. This request stands for the 371 project as well.

Exception to the *RSOP for Recycling Concrete*

In our 771 letter, we requested additional detail on the proposal to use concrete slabs as fill material. The Site responded that additional engineering information would be prepared to document that the use of slabs will meet the requirements of the *RSOP for Recycling Concrete*. This engineering information should also be added to the 371 DOP when it becomes available. Please explain how, under the current demolition plans for 371, the requirements for the Concrete Recycling RSOP will be met, including addressing subsurface voids and subsidence.

Independent Verification Surveys

Page 21 of the DOP reads "DOE and/or the LRA will conduct an independent verification (IV) of the characterization data, if required." Under what circumstances would independent verification not be required? The Coalition requests more information on the independent verification step in the characterization process. Also, for the 707

DOP, the Site agreed to remove the phrase "typically five percent" from the final bullet point on IV surveys. It is appropriate to do so in the 371 DOP.

Thank you again for the opportunity to comment on this document and for your working with Coalition and local government staff. We look forward to continuing our dialogue on this DOP and other D&D issues. Please call me at (303) 412-1200 if you have any questions on the Coalition's comments.

Sincerely,

/s/

David M. Abelson
Executive Director

cc: Hank Dalton, DOE
Joe Legare, DOE
Lane Butler, Kaiser-Hill
Dave Shelton, Kaiser-Hill
Jeff Stevens, Kaiser-Hill
Steve Gunderson, CDPHE
Tim Rehder, EPA
Rocky Flats Coalition of Local Governments
Rocky Flats Citizens Advisory Board